

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

217/524-3300

January 20, 2005

Certified Mail

7002 3150 0000 1106 3188

7002 3150 0000 1106 3195

OWNER

Advanced Environmental Technical
Services (Waste Management, Inc.)
Attn: Brendan Sheehan
720 Butterfield Road, 4th Floor
Lombard, Illinois 60148

OPERATOR

Century Environmental Resources, Inc (CERI)
d/b/a Chemical and Environmental Services, Inc (C&ESI)
Attn: Terry Zarowny
13005 Hamlin Court
Alsip, Illinois 60658

Re: 0310030002 -- Cook County

AETS

(Advanced Environmental Technical Services)

ILD099215303

Part B Log No. B-115-R

RCRA Part B Administrative Record

RELEASABLE
DEC 6 2007
REVIEWER M

Gentlemen:

Enclosed is a Renewal RCRA (Resource Conservation and Recovery Act) Hazardous Waste Management Part B permit. The final permit decision is based on the administrative record contained in the Illinois EPA's files. The contents of the administrative record are described in Title 35 Illinois Administrative Code (Ill Adm. Code) Section 705.211.

The permit is divided into two parts: A RCRA permit issued by Illinois EPA and a Hazardous Waste Management Permit issued by USEPA. The USEPA permit generally contains only those provisions and conditions raised pursuant to the Hazardous and Solid Waste Amendments (HSWA) of 1984 to RCRA. The Illinois EPA permit may also enforce some portions of the HSWA where Illinois EPA has the authority to do so. Read both the permits carefully, failure to meet any portion of either permits could result in civil and/or criminal penalties. A summary of the revisions to the State Part B Permit is included as Attachment 1 to this letter.

Within 35 days after the date of mailing of the Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period. The petition shall include a statement of the reasons supporting a review, including demonstration that any issues raised in the petition, were previously raised during the public comment period. In all other aspects, the

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ELGIN - 595 South State, Elgin, IL 60123 - (847) 608-3131 • PEORIA - 5415 N. University St., Peoria, IL 61614 - (309) 693-5463
BUREAU OF LAND - PEORIA - 7620 N. University St., Peoria, IL 61614 - (309) 693-5462 • CHAMPAIGN - 2125 South First Street, Champaign, IL 61820 - (217) 278-5800
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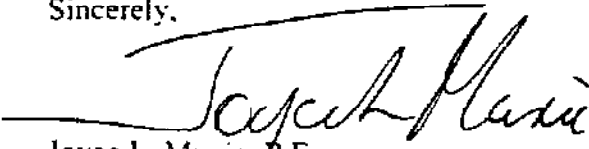
petition shall be in accordance with the requirements for permit appeals as set forth in 35 Ill. Adm. Code Part 105. Nothing in this paragraph is intended to restrict appeal rights under Section 40(b) of the Environmental Protection Act [35 Ill. Adm. Code 705.212(a)]. If you intend to appeal the USEPA Permit, contact USEPA Region V concerning the appeal procedures.

Work required by this permit, your application or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineer Practice Act of 1989, the Professional Geologist Act, and the Structural Engineer Licensing Act of 1989. This permit does not relieve anyone from compliance with these and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

A copy of the Illinois EPA's Response to Significant Comments on the permit is enclosed.

If you have any questions regarding this permit for bulking and storage in containers and tanks, please contact Krishnamurthy S. Gadi of my staff at 217/524-3863. Questions on the USEPA Permit may be directed to Jim Blough, USEPA 312/886-2967.

Sincerely,



Joyce L. Munie, P.E.
Manager, Permit Section
Bureau of Land

~~LEGO~~
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Attachment -- Attachment 1

Enclosures: Response to Comments
RCRA Part B Permit

cc: Jim Blough, USEPA
Sean Chisek, P.E Project Engineer, Andrews Environmental Engineering, Inc.

bcc: Bureau File Mara McGinnis
Des Plaines Region Paula Stine
Hope Wright Krishna Gadi
Ted Dragovich
Steve Nightingale
Jim Moore
Terri Blake Myers

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ATTACHMENT 1

Changes To the Conditions in the Draft Permit

1. On page one (1) of the permit, the address of the operator was changed.
2. Page I-1 Condition I.B.1 status of Truck Pads 1, 2, & 3 has been changed to existing.
3. Page I-1 Condition I.B.1 added Lab Pack Repackaging Room Container Storage Area and Truck Pad 5.
4. Page I-1 Condition I.B.3 revised maximum quantity to 88,220 gallons.
5. Page I-2 Condition I.B.4 was deleted.
6. Page I-3 Condition I.E.1.a.ii typographical error has been corrected.
7. Page I-4 Condition I.E.1.a.ii.2.d was deleted and Condition I.E.1.a.ii.2.c has been modified.
8. Page I-6 Condition I.E.6.b.2 typographical error has been corrected.
9. Page I-7 Condition I.H.1 was deleted and renumbered Conditions I.H.2 & 3 to Conditions I.H.1 & 2.
10. Page I-8 Condition I.J was deleted and subsequent Conditions I.K & I.L were renumbered I.J & I.K.
11. Page I-10 Conditions I.K.6, 6.a, b and c have been renumbered as Conditions I.J.6, 6.a, b and c and have been modified to allow the use of an articulated fume extractor in lieu of fume hood.
12. Page I-11 Condition I.K.6.e was renumbered to Condition I.J.6.e and has been modified.
13. Page I-11 Conditions I.L.2 and 3 were renumbered as Conditions I.K.2 and 3. Condition I.K.2 was also modified to allow the Permittee to conduct a hazardous waste determination on the rinse water generated during closure.

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14. Page I-12 Condition I.L.5 was renumbered to Condition I.K.5 and typographical error has been corrected.
15. Page I-12 Condition I.L.7 was renumbered to Condition I.K.7 and typographical error has been corrected.
16. Page II-1 in Condition II.A the reference has been changed from Condition II.A to II.B.1 and the number of tanks changed from "7" to "3".
17. Page II-1 Condition II.B.1 has been modified to indicate there are three existing 3 aboveground tanks instead of seven and the corresponding maximum volume of waste was reduced to 753,800 gallons.
18. Page II-2-II-4 Condition II.B.1.b has been modified to indicate Tanks TK200, TK300-303, TK407, and TK408 are stainless steel tanks.
19. Page II-4 in Condition II.B.1.b the minimum shell thickness for Tank TK503 has been revised to 0.1907 ins.
20. Page II-4 Second Note (**) changed to Note (*) and has been modified.
21. Page II-5 Condition II.B.4 has been modified to specify that tank modifications must be completed in accordance with the regulations 35 Ill. Adm. Code 703.280.
22. Page II-7 Condition II.F.2.f has been modified to remove the date.
23. Page II-8 Condition II.H.3 has been modified to allow the management of reactive waste in tanks in compliance with 35 Ill. Adm. Code 724.298
24. Section V (Pages V-1 Through V-3)
The draft permit contains post closure requirements for the units Tanks TK3, TK5, TK6, & TK7. This section has been deleted in the final permit; since the units requiring a contingent post closure plan were certified clean closed. (See Log No. B-115-M-15.)

Note: Since Section V Post-Closure has been deleted Sections VI & VII have been renumbered as Section V & VI.
25. Page V-1 Section V, Section I: Containers, the word "soil" has been deleted from L(1).

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26. Page V-1 Section V, Section II: Tanks, the reference to Condition C(2) was changed to F(2)b and the Due Date has been modified to indicate "Annually."
27. Page V-1 Section V, Section II: Tanks, F(2)(f) corrected to reference Condition F(2)(e) instead.
28. Page V-5 Section V, Section VI: Additional Special Condition, N has been deleted.
29. Page VI-2 in Condition VI.1.D.5 "used oil" has been deleted.
30. Page VI-2 in Condition VI.1.E has been modified to reference 35 Ill. Adm. Code 724.117 instead of 40 CFR 265.117.
31. Page VI-3 in Condition VI.1.E the phrase "most recent edition" has been removed.
32. Page VI-3 in Condition VI.1.H.3 viscosity has been deleted from the gate receipt analysis requirements.
33. Page VI-4 Condition VI.1.I.b has been modified as follows:
"Trained personnel (i.e., chemists, Certified Hazardous Materials Managers, etc.) shall review the contents of lab packs to verify the hazardous constituents present and appropriate U.S. EPA hazardous waste class. In the event the Permittee is unfamiliar with a compound in a lab pack, and the Permittee does not have an MSDS (either hard copy or electronic), the Permittee shall obtain an MSDS for the compound from the generator prior to placing the compound in a permitted unit or reject the lab pack containing the compound".
34. Page VI-5 Condition VI.1.M has been modified as follows:
"For waste streams subject to pre-acceptance, 10 percent shall be analyzed to verify the pre-acceptance parameters in table C-4 of the approved WAP in the renewal permit application Log No. B115R. Multiple shipments of the same waste in a calendar year is considered one waste stream unless Condition VII.K 1 applies".
35. Page VI-5 to correct typographical error Condition VI.3: Reporting Requirements has been renumbered to Condition VI.2 and other Conditions Closure, General Operating Requirements, Construction Requirements, and Contingency Plan have been renumbered 3, 4, 5, & 6 respectively.

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36. Page VI-6 in Condition VI.3: Closure the word "insure" a typographical error has been corrected to "ensure".
37. Page VI-7 Condition VI.5.b has been modified as follows:
"The Agency shall review the certification described above to ensure the tank system and its secondary containment meets the requirements of 35 IAC 724.292 and 724.293".
38. Page VI-7 Condition VI.6.B.1.a has been modified as follows:
 - a) *Condition VI.6.B.1.a the requirement to notify Best Environmental, Inc., or Mars Environmental Solutions has been deleted*
 - b) *New Condition VI.6.D was added to the permit to address the use of an environmental contractor to respond to an emergency.*
40. Page D-1 Attachment D, Second Paragraph missing Attachment D-1 has been added to the final permit.
41. Page E-1 Attachment E, Condition 1.a The requirements to provide financial assurance for Tanks TK3, 5, 6, & 7 have been deleted.
42. Page E-1 Attachment E, Condition 1.b The requirements to provide financial assurance for Tank 4 have been deleted.

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**RESPONSE TO COMMENTS
REGARDING THE ILLINOIS EPA PORTION OF
THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)
HAZARDOUS WASTE MANAGEMENT PERMIT TO BE ISSUED TO
AETS**

All comments received during the public comment period become part of the IEPA/USEPA Administrative Record for consideration in the final permit decision-making process. Except for those comments submitted by the applicant, no comments were received from the public during the public meeting or the formal public comment period. The following comments on the draft permit were received from the company.

Comment No. 1: Cover Page, Operator Address (page 1)

AETS request the operator address be changed to the facility mailing address. AETS request the operator address be changed to 13005 Hamlin Court, Alsip, Illinois 60658. The Part A permit application form has been modified to indicate the Facility Permit Contact Mailing Address and the Operator Mailing Address is the address of the facility.

Response:

The Illinois EPA has reviewed your comment and has modified the permit accordingly.

Comment No. 2: Condition I.B.1 (Page I-1)

This condition lists Truck Pads 1, 2 and 3 as "Proposed." Information contained in this revision documents Truck Pads 1, 2 and 3 are ready for operation. We request the status of Truck Pads 1, 2 and 3 be change to "Existing."

We also propose to add two additional container storage areas to the permit. The first additional container storage area consists of Truck Pad 5, located north of the east tank farm. The second additional container storage area will be located in the lab pack repackaging room. Information regarding these additional container storage areas is included in this revision. We request Truck Pad 5 be added to Condition I.B.1 as an "Existing" unit. The floor in the lab pack repackaging room has been sealed with epoxy, and the operator is in the process of obtaining metal berms with neoprene gaskets to place in the doorways of the lab pack repackaging room.

Response:

The Illinois EPA has reviewed your comment and has modified the permit accordingly.

Comment No. 3: Condition I.B.4 (Page I-2)

This condition states that waste may be stored in the proposed Container Storage Building on a ten-day transfer basis only. We request to store waste in the Container Storage Building for



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greater than ten days. The Part B permit renewal application documents that waste will be stored in a manner protective of human health and the environment. We request the requirement to store waste on a ten-day transfer basis be deleted from this condition, or that Condition I.B.4 be deleted in its entirety.

Response:

The Illinois EPA has reviewed your comment and has modified the permit accordingly.

Comment No. #4: Condition I.E.1.a.ii (Page I-3)

There appears to be a typographical error in this condition. We request "outdoors" be changed to "outdoor".

Response:

The Illinois EPA has reviewed your comment and has modified the permit accordingly.

Comment No. #4: Condition I.E.1.a.ii.2.d (Page I-4)

This condition references Conditions I(E)(1)(a)(i)(2) and I(E)(1)(a)(iii)(2). It does not appear Condition I(E)(1)(a)(i)(2) is applicable, as Condition I(E)(1)(a)(i) is for indoor container storage areas while Condition I(E)(1)(a)(ii) is for outdoor container storage areas. Also, the reference to Condition I(E)(1)(a)(iii)(2) is unclear as there is no Condition I(E)(1)(a)(iii)(2) in the permit. We request the references to Conditions I(E)(1)(a)(i)(2) and I(E)(1)(a)(iii)(2) either be corrected, or deleted.

Response:

The Illinois EPA has reviewed your comment and has deleted the Condition I.E.1.a.ii.d.

Comment No. #5: Condition I.E.6.b.2 (Page I-6)

There appears to be a typographical error in this condition. We request "composting" be changed to "compositing".

Response:

The Illinois EPA has reviewed your comment and has modified the permit accordingly.

Comment No.#6: Condition I.H.1 (Page I-7)

This condition states reactive waste may be accepted on a 10-day transfer basis only. Information

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contained in this submittal documents reactive waste will be managed in accordance with 35 Ill. Adm. Code 724.117. We request Condition I.H.1 be deleted and subsequent conditions renumbered.

Response:

The Illinois EPA has reviewed your comment and has modified the permit accordingly.

Comment No. #7: Condition I.J.a (Page I-8)

This condition states the construction certification document for Truck Pads 1, 2 and 3 shall contain the information required in Attachment H. Attachment H contains the pre-acceptance analysis requirements while Attachment G contains the construction certification documents. Information contained in this revision certifies Truck Pads 1, 2 and 3 are ready for operation. As the construction certification for Truck Pads 1, 2 and 3 is contained in this submittal, we request Condition I.J be deleted and subsequent conditions re-lettered.

Response:

The Illinois EPA has reviewed your comment and the additional information submitted by AETS, and Condition I.J was deleted and the subsequent conditions have been renumbered.

Comment No. #8: Condition I.J.a.i (Page I-8)

This condition requires the Permittee to complete RCRA closure of Truck Pads 1, 2 and 3 or provide a statement the base is free of cracks or gaps. The condition goes on to require, in the event cracks or gaps are found, a sampling and analysis plan is to be submitted to the Illinois EPA.

As Truck Pads 1, 2 and 3 are not currently operating units, it is not clear why the permit states the truck pads should complete RCRA closure. Also, as Truck Pads 1, 2 and 3 are not undergoing RCRA closure, a soil sampling and analysis plan is not necessary in the event cracks or gaps are found in the base of the pads.

Also, as discussed in Revision 1, December 2003, Truck Pad 3 will hold non-ignitable, non-reactive bulked solids. Truck Pad 3 will not store wastes containing free liquids (i.e., that fail the Paint Filter test). Due to the fact Truck Pad 3 will not store wastes containing free liquids, traditional secondary containment is not required for Truck Pad 3. 35 Ill. Adm. Code 724.275(c) states:

Storage areas that store containers holding only wastes that do not contain free liquids need not have a containment system defined by paragraph (b) except that as by paragraph (d) or provided that:

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1) The storage area is sloped or is otherwise designed and operated to drain and remove liquid resulting from precipitation, or

2) The containers are elevated or are otherwise protected from contact with accumulated liquid.

It can be seen from the drawings provided in Exhibit D-35 that Truck Pad 3 is sloped to a sump to drain and remove liquid resulting from precipitation, meeting the requirements of 35 Ill. Adm. Code 724.275(c)(1). Containers will also be stored on pallets, which will keep the containers elevated, meeting the requirements of 35 Ill. Adm. Code 724.275(c)(2). Therefore, the secondary containment requirements of 35 Ill. Adm. Code 724.275(c) are met for Truck Pad 3. Truck Pad 3 will not store hazardous wastes with listed waste codes F020, F021, F022, F023, F026, or F027. Again, Truck Pad 3 will only store non-ignitable, non-reactive bulked solid (non-liquid) waste. It should be noted that although it is proposed Truck Pad 3 will only hold non-liquid waste, Truck Pad 3 has been sealed similar to Truck Pads 1 and 2, as though it will store liquid wastes.

As the construction certification information for Truck Pads 1, 2 and 3 is contained in this submittal, we request Condition I.J be deleted and subsequent conditions re-lettered.

Response:

The Illinois EPA has reviewed your comment. Please refer to the Illinois EPA's response to Comment No: 8.

Comment No. #9: Condition I.K.6.b and c (Page I-10)

These conditions list the locations of fume hoods in the lab pack repackaging room. Exhibit D-42, Figure 1 of this submittal indicates the locations of the lab pack repackaging stations, and articulated arm fume extractors. Two repackaging stations will be located along the west wall of the lab pack repackaging room, two repackaging stations will be located on the north wall of the room and two repackaging stations will be located on the south wall of the lab pack repackaging room. We request Condition I.K.6.b be updated to reflect the locations of the lab pack repackaging stations.

We also request Conditions I.K.6.b and c be updated to allow the use of articulated arm fume extractors, instead of fume hoods. Articulated arm fume extractors will allow the operator to position the fume extractor in the best location possible for fume extraction, while providing the operator freedom of movement necessary to perform the lab pack repackaging in a manner safe to human health and the environment.

Response:

The Illinois EPA reviewed your comment and the additional information submitted by AETS and revised subsequent conditions. The Condition I.K.6, Conditions I.K.6.a, b and c have been

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changed to Conditions I.J.6, and I.J.6.a, b and c. The Condition I.J.6, Conditions I.J.6.b and c have been modified to allow the operation of articulated arm fume extractor in lieu of a fume hood.

Comment No. #10: Condition I.K.6.e (Page I-11)

This condition states the arrangements of pallets or bulk containers in Building #2 shall be as identified in drawing D36. Exhibit D-42, Figure 1 of this submittal indicates the locations of the arrangement to be used in the lab pack repackaging room. We request Condition I.K.6.e be modified to reference Exhibit D-42, Figure 1 of the approved RCRA Part B renewal permit application.

Response:

The Illinois EPA reviewed your comment and has modified the Condition I.K.6.e to reference Exhibit D-42 of the approved permit application.

Comment No. #11: Conditions I.L.2 and 3 (Page I-11).

Condition I.L.2 states all wash and rinse water generated during closure of the container storage areas shall be managed as a hazardous waste. Condition I.L.3 states all wash and rinse water generated during closure shall be managed as a hazardous waste, unless the Permittee can document that the waste is not hazardous as defined in 35 Ill. Adm. Code 721.103. We request Condition I.L.2 be modified to include the language contained in Condition I.L.3.

Response:

The Illinois EPA reviewed your comment and has modified Condition I.L.2 accordingly.

Comment No. #12: Condition I.L.5 (Page I-12).

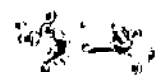
There appears to be a typographical error in the third sentence of this condition. We request "Implementation" not be capitalized.

Response:

The Illinois EPA reviewed your comment and has modified Condition I.L.5 accordingly.

Comment No. #13: Condition I.L.7 (Page I-12).

We request the paragraph starting "A Closure Documentation Report..." be indented to line up with the preceding paragraph.



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Response:

The Illinois EPA has reviewed your comment and has modified the permit accordingly.

Comment No. #14: Condition II.A (Page II-1).

The statement in the first sentence reading "in accordance with Condition II.A" is unclear as Condition II.A is referencing itself. We request this circular reference be deleted or clarified.

Response:

The Illinois EPA reviewed your comment and has changed the reference from Condition II.A to Condition II.B.1.

Comment No. #15: Condition II.B.1.a (Page II-1).

This condition lists the minimum shell thicknesses of tanks at the facility. Revision 11 dated August 26, 2004, proposed to delete the requirement for a minimum shell thickness of Tanks 11, 12 and 13. When assessing whether a tank is fit for operation, shell thickness testing is one component of the assessment. The tank assessment relies heavily on a detailed visual inspection of the tank. During the visual inspection of Tanks TK-11 and 12, no pitting, scale or cracks were observed. The visual inspection of Tanks TK-11 and 12 did not indicate any cracks or other problems where the tanks were welded. The specifications in the original Part B permit application were specifications derived from API 650. It should be noted, the API 650 standard is considered a "heavy duty" standard, and the proposed operation of Tanks TK-11 and 12 is not as heavy duty as described in API 650. It is proposed to remove the minimum required shell thickness for tanks TK-11, 12 and 13 from the permit application. The tanks will be inspected and assessed as required in the permit, and any changes in the frequency of tank inspection or monitoring will be made in accordance with subsequent tank inspection and testing.

Response:

The Illinois EPA is unable to comply with request. The Permittee can propose alternative methods for determining the tanks meet the minimum shell thickness as a permit modification.

Comment No. #16: Condition II.B.1.b (Pages II-2 through 4).

As documented in Exhibit B-12 and Section D of the Part B permit renewal application, Tanks TK200, TK300-303, TK407 and TK408 are to be constructed of stainless steel, not carbon steel. We request Condition II.B.1.b be modified to reflect these tanks will be constructed of stainless steel.

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Response:

The Illinois EPA has reviewed the comment and has modified the permit Condition II.B.1.b to indicate these tanks are stainless steel.

Comment No. #17: Condition II.B.1.b (Page II-4).

As documented in Exhibit B-12 of the Part B permit renewal application, the minimum shell thickness for Tank TK503 is 0.1907 inches. We request the minimum shell thickness for Tank TK503 be corrected.

Response:

The Illinois EPA has reviewed your comment and has modified the minimum shell thickness for Tank TK503 in the permit accordingly.

Comment No. #18: Second Note (Page II-4).

The comment associated with this note is similar to the Comment 20, regarding Condition II.B.4. Please see Comment 20.

Response:

The Illinois EPA has reviewed your comment and modified the Condition II.B.4.

Comment No. #19: Condition II.B.4 (Page II-5).

This condition states Tank TK13 shall be repaired in accordance with 35 Ill. Adm. Code 724.296(f), or replaced after obtaining a permit modification in accordance with 35 Ill. Adm. Code 703, Subpart G. As discussed in Revision 11, August 26, 2004, it is planned to replace tank TK13 with a tank of similar design standards and capacity. In accordance with 35 Ill. Adm. Code 703, Appendix A, G.3, the replacement of a tank is considered a Class 1 permit modification as long as:

- The replacement tank meets the same design standards;
- The replacement tank has a capacity difference of no more than 1,500 gallons;
- The permitted tank capacity is not increased; and
- The replacement tank meets the same conditions in the permit.

We request the second note of Condition II.B.1.b (Page II-4) be changed to read:

This tank shall be placed back into service in accordance with Condition II(B)(4).

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We request Condition II.B.4 be changed to read:

The Permittee shall repair tank TK13 in accordance with 35 Ill. Adm. Code 724.296(f), or replace tank TK13. If tank TK13 is replaced, and the replacement tank meets the conditions specified in 35 Ill. Adm. Code 703, Appendix A, G.3, the tank replacement shall be made as a Class 1 modification. If the replacement tank does not meet the conditions specified in 35 Ill. Adm. Code 703, Appendix A, G.3, the tank replacement shall be made as a Class 2 modification.

Response:

The Illinois EPA has reviewed your comment and has modified the Condition II.B.4 as follows:

"The Permittee shall repair tank TK13 in accordance with 35 Ill. Adm. Code 724.296(f), or replace tank TK13 following the permit modification requirements specified in 35 Ill. Adm. Code 703.280 and Appendix A, G."

Comment No. #20: Condition II.F.2.f (Page II-7).

This condition references 35 Ill. Adm. Code 724.296 (as amended July 16, 1987). 35 Ill. Adm. Code 724.296 was last amended effective February 14, 2003. We request the date reference to 35 Ill. Adm. Code 724.296 be deleted so the condition will always reference the most recent 35 Ill. Adm. Code 724.296.

Response:

The Illinois EPA has reviewed your comment and has modified Condition II.F.2.f referencing 724.296 to delete the date.

Comment No. #21: Condition II.H.2 (Page II-8).

This condition references the National Fire Protection Association's "Flammable and Combustible Liquids Code" (NFPA 30), 1987 edition. The latest version of NFPA 30 was published in 2003. We request the reference to the 1987 edition be deleted. It is recognized the reason Illinois EPA put the reference to the 1987 edition in the permit is because the 1987 edition is referenced in 35 Ill. Adm. Code 721.211. However, it is not clear how referencing an out-of-date fire protection standard will be protective of human health and the environment.

Response:

The Illinois EPA is unable to comply with request, since compliance with the 1987 version of the NFPA document is a regulatory requirement. The 1987 document was adopted by reference in our regulations at Ill. Adm. Code 720.111. Therefore, the Agency must use this document as our standard.

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Comment No. #22: Condition II.H.3 (Page II-8).

This condition states reactive waste may not be stored in tanks. Information contained in this submittal documents reactive waste will be managed in accordance with 35 Ill. Adm. Code 724.117 and 724.298. We request Condition II.H.3 be deleted.

Response:

The Illinois EPA reviewed your comment and has modified the permit condition as follows:

- a) Ignitable or reactive waste must not be placed in tank system unless the following is true:
 - 1) The waste is treated, rendered, or mixed before or immediately after placement in the tank system so that following is true:
 - A) The resulting waste, mixture, or dissolved material no longer meets the definition of ignitable or reactive waste under 35 Ill. Adm. Code 721.121 or 721.123; and
 - B) Section 724.117(b) is complied with; or
 - 2) The waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite or react; or
 - 3) The tank is used solely for emergencies.
- b) The owner or operator of a facility where ignitable or reactive waste is stored or treated in a tank must comply with the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon, as required in Tables 2-1 through 2-6 and Table 5-3.1.1 of the National Fire Protection Association's "Flammable and Combustible Liquid Code," NFPA 30, incorporated by reference in 35 Ill. Adm. Code 720.111.

Comment No. #23: Section V (Pages V-1 through V-3).

We request Section V be deleted from the permit as Tanks TK-3, 5, 6 and 7 have been "clean" closed. Documentation of "clean" closure of these tanks was submitted to the Illinois EPA on December 29, 2003, and was re-submitted as a part of the Part B permit renewal application on August 30, 2004. As Tanks TK-3, 5, 6 and 7 have been "clean" closed, there is no need to conduct post-closure care of these tanks.

Response:

The Illinois EPA has reviewed your comment and has modified the permit to indicate that post-closure care is no longer required for these units.

Comment No. #24: Section VI, Section I: Containers, L(1) (Page VI-1).

Condition I.L.1 of the permit requires the facility to submit a sampling and analysis plan to demonstrate the container storage area has been properly decontaminated. Condition I.L.1 does not require the submittal of a soil sampling and analysis plan. We request the reference to a soil sampling and analysis plan in Section VI, Section I: Containers, L(1), be deleted.

Response:

The Illinois EPA has reviewed your comment and has modified the Condition I.L.1 changing "Submit soil sampling and analysis plan for review" to "Submit sampling and analysis plan for review".

Comment No. #25: Section VI, Section II: Tanks, C(2) (Page VI-1).

Condition II.C.2 of the permit does not require the submittal of results from leak tests. We request this reporting requirement either be corrected, or deleted.

Response:

The Illinois EPA reviewed your comment and this requirement now references "F(2)(b)" instead of C(2) and the due date has been changed to annually.

Comment No. #26: Section VI, Section III: Standard Conditions, 14 (Page VI-2).

Condition III.14 of the permit does not require the Permittee to notify the Illinois EPA of planned physical alterations or additions 15 days prior to the planned change. Condition III.14 requires the Permittee to notify the Illinois EPA as soon as possible of any planned physical alterations or additions. Upon receipt of a notification of planned physical alterations or additions, the Illinois EPA has 15 days to notify the Permittee of its intent to inspect the physical alteration or addition. We request this notification requirement be corrected to indicate the notification must be made as soon as possible.

Response:

35 Ill. Adm. Code 702.160 and 703.241(a)(2) allows the Agency to establish conditions as required on a case-by-case basis, to provide for and assure compliance with all applicable requirements of the Act and regulations or as necessary to protect human health and the environment. The requirement of a 15-day period for these notifications is a reasonable time frame. Therefore this condition will not be modified.

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Comment No. #27: Section VI, Section III: Standard Conditions, 15 (Page VI-2).

Condition III.15 of the permit does not require the Permittee to notify the Illinois EPA of changes that may result in permit noncompliance 15 days prior to the change. Condition III.15 requires the Permittee to give advance notice to the Illinois EPA of planned changes that may result in noncompliance. Upon receipt of the notification, the Illinois EPA has 15 days to notify the Permittee of its intent to inspect the facility. We request this notification requirement be corrected to indicate the notification must be made in advance of changes that may result in permit noncompliance.

Response:

35 Ill. Adm. Code 702.160 and 703.241(a)(2) allows the Agency to establish conditions as required on a case-by-case basis, to provide for and assure compliance with all applicable requirements of the Act and regulations or as necessary to protect human health and the environment. The requirement of a 15-day period for these notifications is a reasonable time frame. Therefore this condition will not be modified.

Comment No. #28: Section VI, Section VI: Additional Special Condition (Page VI-5).

Section VI is the reporting and notification requirements. Section VII is the section containing additional special conditions. We request the reference to Section VI be changed to Section VII.

Response:

The Illinois EPA has reviewed your comment and has modified the permit accordingly.

Comment No. #29: Section VI, Section VI: Additional Special Condition, N (Page VI-5).

There is no Condition N in Section VII: Additional Special Conditions. We request the reference to Condition N either be corrected or deleted.

Response:

The Illinois EPA has reviewed your comment and has deleted Condition N.

Comment No. #30: Condition VII.1.D.5 (Page VII-2).

We propose to accept used oil in the RCRA permitted fuels blending program. Information contained in this submittal updates the Waste Analysis Plan to account for the acceptance of used oil in the fuels blending program. We request Condition VII.1.D.5 be deleted and subsequent conditions renumbered.

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Response:

The Illinois EPA has reviewed your comment and has modified Condition VI.1.D. The facility may receive used oil in accordance with the conditions of this permit.

Comment No. #31: Condition VII.1.E (Page VII-2).

The last sentence of this condition states ignitable wastes shall be handled in accordance with 40 CFR 265.17. 40 CFR 265 is applicable to interim status facilities, not permitted facilities. We request the reference to 40 CFR 265.17 be changed to 40 CFR 264.17.

Response:

The Illinois EPA has reviewed your comment and modified the permit to reference 35 Ill. Adm. Code 724.117.

Comment No. #32: Condition VII.1.H.3 (Page VII-3).

We request the requirement to conduct gate receipt analysis for viscosity be removed from the permit. The waste analysis plan has been revised to remove the requirement for viscosity analysis.

Response:

The Illinois EPA reviewed your comment and the additional information the Permittee submitted on October 8, 2004. The Illinois EPA has modified the Condition VII.1.H.3 to delete "viscosity" from the gate receipt analysis requirements.

Comment No. #33: Condition VII.1.I.b (Page VII-4).

The waste analysis requirements for lab packs have been discussed with Mr. Mark Schollenberger, P.E. Mr. Schollenberger indicated the waste analysis requirements for lab packs contained in the Part B permit renewal application are acceptable. We request Condition VII.1.I.b be modified to be consistent with the Part B permit renewal application. We request Condition VII.1.I.b be changed to read:

Trained personnel (i.e., chemists, Certified Hazardous Materials Managers, etc.) shall review the contents of lab packs to verify the hazardous constituents present and appropriate U.S. EPA hazardous waste class. In the event the Permittee is unfamiliar with a compound in a lab pack, and the Permittee does not have an MSDS (either hard copy or electronic), the Permittee shall obtain an MSDS for the compound from the generator prior to accepting the compound.

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Response:

The Illinois EPA has reviewed your comment and has modified the Condition VII.1.I.b as follows:

"Trained personnel (i.e., chemists, Certified Hazardous Materials Managers, etc.) shall review the contents of lab packs to verify the hazardous constituents present and appropriate U.S. EPA hazardous waste class. In the event the Permittee is unfamiliar with a compound in a lab pack, and the Permittee does not have an MSDS (either hard copy or electronic), the Permittee shall obtain an MSDS for the compound from the generator prior to placing the compound in a permitted unit or reject the lab pack containing the compound".

Comment No. #34: Condition VII.1.M (Page VII-5).

Based on conversations with Mr. Mark Schollenberger, P.E., at a minimum, gate receipts from 10 percent of different generators must be analyzed to verify the pre-acceptance parameters in Table C-4 of the Part B renewal application. In order to clarify the analytical requirements, we request Condition VII.1.M be modified to read:

Waste streams subject to pre-acceptance analysis, from 10 percent of different generators shall be analyzed to verify the pre-acceptance parameters in Table C-4 of the approved WAP in the renewal permit application.

Response:

The Illinois EPA has reviewed your comment and has modified the Condition VII.1.M as follows:

"For waste streams subject to pre-acceptance, 10 percent shall be analyzed to verify the pre-acceptance parameters in table C-4 of the approved WAP in the renewal permit application Log No. B115R. Multiple shipments of the same waste in a calendar year is considered one waste stream unless Condition VII.K 1 applies".

Comment No. #35: Condition VII.4 (Page VII-6).

There appears to be a typographical error in this condition. We request "insure" be changed to "ensure."

Response:

The Illinois EPS has reviewed your comment and has modified the permit accordingly.

Comment No. #36: Condition VII.6.b (Page VII-7).

There appears to be a typographical error in the second sentence of this condition. The first sentence references the construction certification of tanks. The second sentence states the Illinois EPA will review the construction certification of the container storage areas to ensure the secondary containment meets the requirements of 35 Ill. Adm. Code 725.292 and 725.293. 35 Ill. Adm. Code Part 725 is applicable to interim status facilities, not permitted facilities. Also, 35 Ill. Adm. Code 725.292 and 293 contain requirements for secondary containment systems associated with tanks, not container storage areas as discussed in the permit condition. We request the second sentence of this condition be changed to read:

The Agency shall review the certification described above to ensure the tank system and its secondary containment meets the requirements of 35 IAC 724.292 and 724.293.

Response:

The Illinois EPA has reviewed your comment and has modified the permit condition as follows:

"The Agency shall review the certification described above to ensure the tank system and its secondary containment meets the requirements of 35 IAC 724.292 and 724.293".

Comment No. #37: Condition VII.7.B.1.a (Page VII-7).

We request the requirement to notify Best Environmental, Inc. and Mars Environmental Solutions be deleted from the permit. At this time, it is not known whether Mars Environmental Solutions is in business. We request Condition VII.7.B.1.a be modified to read:

A qualified contractor, if necessary.

Response:

The Illinois EPA has reviewed your comment and has modified the permit accordingly. The approval of the contingency plan was based in part on the Permittee having a qualified contractor available to do the portions of the work outlined in the contingency plan. In addition the Permittee has not provided modeling or other information which would be used to determine when it was necessary to contact the contractor therefore the following changes will be made to the permit conditions:

- a) Condition VII.7.B.1.a will be deleted.
- b) New Condition VII.7.D will be added to the permit:

"Prior to accepting waste the Permittee shall make arrangements with the qualified environmental contractor to provide emergency response services in

accordance with the approved contingency plan. The name, address, phone number and responsibilities of the emergency contractor shall be attached to all the Permittee's copies of the contingency plan. The agreement between the emergency response contractor and the Permittee shall be included in the facilities Operating record. The contractor shall be notified in accordance with the procedures in Condition VII.7.B".

Comment No. #38: Attachment D, Second Paragraph (Page D-1).

The last sentence states the location of the SWMUs are shown in Attachment D-1. There is no Attachment D-1 in the permit.

Response:

The Illinois EPA reviewed the comment and has added Attachment D-1 to the final permit.

Comment No. #39: Attachment E, Condition 1.a (Page E-1).

- a. This condition requires the financial assurance mechanism to be updated to incorporate the cost estimates for closing the interim status tank systems which are not included in the permit. There are currently no interim status tanks located at the facility.

The only interim status tank system that was at the facility was Tank 4. A closure documentation report for Tank 4 was submitted to the Illinois EPA on November 13, 2003, and incorporated into the renewal application on August 30, 2004 (Revision 12). Tank 4 is no longer physically located at the facility. However, corrective action activities are being conducted. The facility has a corrective action cost estimate covering the cost of corrective action activities. We believe the corrective action cost estimate is sufficient to provide for closure activities associated with Tank 4.

If it is the Illinois EPA's intent to have the Permittee incorporate the cost estimates for closure of Tanks 3, 5, 6 and 7 into the financial assurance, we request this requirement be deleted. A closure certification report for Tanks 3, 5, 6 and 7 was submitted to the Illinois EPA on December 29, 2003, and re-submitted as part of the Part B permit renewal application on August 30, 2004 (Revision 12). The closure certification report documents "clean" closure of Tanks 3, 5, 6 and 7. As Tanks 3, 5, 6 and 7 have been "clean" closed, there is no need to provide financial assurance for closure of these tanks.

- b. The last sentence of Attachment E, Condition 1.a requires financial assurance instruments be submitted to the Illinois EPA no later than the effective date of the



permit. The effective date of a RCRA Part B permit is typically 35 days after the Illinois EPA issues the final permit. However, the financial assurance regulations in 35 Ill. Adm. Code 724 require modified financial assurance documents be submitted within 60 days after the closure cost estimate has increased. Therefore, we request the last sentence of Attachment E, Condition 1.a be changed to read:

Financial assurance instruments (using the standardized forms promulgated under the provisions of 35 Ill. Adm. Code 724.251) shall be submitted to the Illinois EPA no later than 60 days after the final RCRA Part B renewal permit is issued.

Response:

The Illinois EPA has reviewed your comment and has modified Condition E.1.a eliminating requirements in the permit to provide financial assurance for Tanks TK3, 5, 6, & 7.

35 IAC 724.243 requires the owner or operator to increase the financial assurance within 60 days after the current closure cost estimate increases; therefore, Condition E.1 has been modified to allow the permittee to provide revised financial assurance instruments within 60 days of the issue date.

Comment No. #40: Attachment E, Condition 1.b (Page E-1).

- a. This condition requires the financial assurance mechanism to be updated to incorporate the cost estimates for closing the interim status tank systems which are not included in the permit. There are currently no interim status tanks located at the facility.

The only interim status tank system that was at the facility was Tank 4. A closure documentation report was submitted to the Illinois EPA on November 13, 2003, and re-submitted as part of the Part B permit renewal application on August 30, 2004 (Revision 12). Tank 4 is no longer physically located at the facility. However, corrective action activities are being conducted. The facility has a corrective action cost estimate covering the cost of corrective action activities. We believe the corrective action cost estimate is sufficient to provide for closure activities associated with Tank 4.

If it is the Illinois EPA's intent to have the Permittee incorporate the cost estimates for closure of Tanks 3, 5, 6 and 7 into the financial assurance, we request this requirement be deleted. A closure certification report for Tanks 3, 5, 6 and 7 was submitted to the Illinois EPA on December 29, 2003, and re-submitted as part of the Part B permit renewal application on August 30, 2004 (Revision 12). The closure certification report document "clean" closure of Tanks 3, 5, 6 and 7. As Tanks 3, 5,

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6 and 7 have been "clean" closed, there is no need to provide financial assurance for closure of these tanks. We request the closure cost estimate for Tanks TK3, 5, 6 and 7 be deleted from the permit.

- b. We also request Attachment E, Condition 1.b be modified to indicate the Permittee need only provide financial assurance for units that are operating and not certified closed. There is no need to provide financial assurance for closure of proposed units that are not installed.
- c. Information contained in this submittal updates the closure cost estimate for the waste management units at the facility. We request the permit be updated to reflect the revised cost estimates.

Response:

The Illinois EPA reviewed your comment and has modified the permit accordingly. Please see our response to comment #40.

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE MANAGEMENT RCRA PERMIT

IEPA #0310030002 -- Cook County
USEPA ILD #099215303
AETS
RCRA Permit No. B-115-R
RCRA Part B - Administrative Record

Issue Date: January 19, 2005
Effective Date: February 23, 2005
Expiration Date: January 19, 2015

OWNER

Advanced Environmental Technical
Services (Waste Management, Inc.)
Attn: Brendan Sheehan
720 Butterfield Road, 4th Floor
Lombard, Illinois 60148

OPERATOR

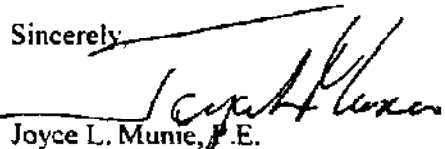
Century Environmental Resources, Inc (CERI)
d/b/a Chemical and Environmental Services, Inc (C&ESI)
Attn: Terry Zarowny
13005 Hamlin Court
Alsip, Illinois 60658

A Part B permit is hereby granted pursuant to the Resource Conservation and Recovery Act, Illinois Environmental Protection Act, and Title 35 Illinois Administrative Code (Ill Adm. Code) Parts 702, 703, 705, and 720 through 729 to Advanced Environmental Technical Services as owner and Century Environmental Resources, Inc., as operator to construct, maintain and operate a waste management facility involved in the treatment, bulking and storage of hazardous waste. The AETS is located at 13005 Hamlin Court, Alsip, Illinois 60658.

This permit consists of the conditions contained herein (including those in any attachments and appendices) and all applicable regulations contained in the Act and 35 Ill Adm. Code Parts 702, 703, 705, and 720 through 729 in effect on the effective date of this permit. The Environmental Protection Act (Ill. Rev. Stat., Chapter 111 ½, Section 1039) grants the Illinois Environmental Protection Agency (Illinois EPA) the authority to impose conditions on permits, which is issued. This permit contains 126 pages including attachments A through I.

If you have any questions regarding this permit, please contact Krishnamurthy S. Gadi at 217/524-3863.

Sincerely,


Joyce L. Muncie, P.E.
Manager, Permit Section
Bureau of Land

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Attachments: Hazardous Waste Management RCRA Part B Renewal Permit

cc: James Blough, USEPA Region V
Sean Chisek, P.E Project Engineer, Andrews Environmental Engineering, Inc

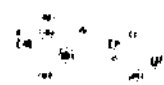
RCRA Hazardous Waste Management Permit

AETS

Alsip, Illinois

ILD099215303

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RCRA Hazardous Waste Management Permit

0310030002-Cook County
USEPA ID: ILD099215303
AETS

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USEPA ID: 099215303

LIST OF ATTACHMENTS

Attachment A--List of Wastes that Can be accepted at this Facility	A-1 - A-26
Attachment B--Inspection Schedule	B-1 - B-7
Attachment C--Examples of Incompatible Wastes	C-1 - C-6
Attachment D--Summary of Corrective Action Activities	D-1 - D-5
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General Facility Description
AETS
Alsip, Illinois

I. Description of facility:

The AETS facility is owned by Advanced Environmental Technical Services, LLC (Waste Management, Inc.) and operated by Century Environmental Resources, Inc (CERI) d/b/a Chemical and Environmental Services, Inc (CESI). AETS is a commercial hazardous waste treatment, bulking, storage and transfer facility in Alsip, Illinois. The AETS Facility is located within the city limits of Alsip at 13005 Hamlin Court, Alsip, Illinois. AETS is an existing facility that has been operating since February 11, 1982. The facility initially conducted hazardous and non-hazardous waste fuel blending.

The facility will accept a wide variety of both hazardous and non-hazardous wastes from a range of industries. The containerized waste materials and lab packs will be transferred from the service vehicles onto trailers destined for the ultimate treatment facilities. Materials transported to the site in containers and lab packs will be unloaded into on site storage tanks or stored in designated container storage areas.

The total property, (as described Lot 1 in Staat's resubdivision, being a resubdivision of the North 210.0 feet of the South 553.0 feet of Lots 7 and 8 in Blue Island Gardens subdivision of the South ½ of the Northwest ¼ (except the East 20 acres thereof and except the West one-eleventh of that part of said Northwest ¼ lying West of said East 20 acres) in Section 35, Township 37 North, Range 13 East of the 3rd Principal Meridian, in Cook County, encompasses approximately 6.76 acres), owned by Advanced Environmental Technical Services, LLC (Waste Management, Inc.). However of that total, only southern portion of 1.65 acres is used for management of RCRA Hazardous Waste and is the subject of this permit. The site plan provided in Attachment (D-1) of the approved application displays the location of the existing and proposed hazardous waste management units. All hazardous waste management units will be located on the permitted southern portion of the property, as shown on the plan. The Permittee is prohibited from conducting waste management activities on the unpermitted north portion of the property.

SECTION I - CONTAINERS**A. Summary**

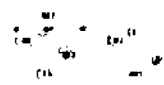
Containers of hazardous waste received at the facility for storage will arrive in 5-gallon steel pails, 16-gallon drums (steel or polyethylene plastic) and fiber boxes, 30-gallon drums (steel or polyethylene plastic) or 55-gallon steel drums and compressed gas cylinders. Other containers may also be accepted provided they are DOT approved, in good condition, compatible with the waste and can be safely managed by this facility. These containers will be stored in the areas designated in Condition I(B)(1). AETS may also store waste generated on site in these storage areas prior to shipment off-site. Containers in the storage areas located inside a building must be stored in a manner consistent with the NFPA 30 requirements for a liquid waste storage warehouse. The existing container storage areas have concrete floors.

B. Waste Identification

1. All hazardous waste stored in containers shall be located in the storage areas shown below:

<u>Location</u>	<u>Capacity (Gallons)</u>	<u>Status</u>
Outdoor Container Storage Area	1,760	Existing
Container Storage Warehouse	73,920	Proposed
Lab Pack Repackaging Container Storage	1540	Existing
Truck Pad 1	2,200	Existing
Truck Pad 2	2,200	Existing
Truck Pad 3	3,960	Existing
Truck Pad 5	2,640	Existing

2. The Permittee may only store containers of hazardous waste identified in Attachment A and containers of non-hazardous wastes identified in the current operating permit for the facility such as non-hazardous used, waste, off-spec and surplus oils for supplemental fuel blending that include crankcase oils, hydraulic oils, cutting mineral oils, spent non-halogenated aliphatic solvents including mineral spirits and gasoline for tank storage only. Storage outside the areas identified in I(B)(1) is prohibited.
3. A maximum of 88,220 gallons of waste may be stored at this facility in containers.



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C. Condition of Containers

1. If a container holding waste is not in good condition (e.g., severe rusting, apparent structural defect, etc.) or if it begins to leak (this includes waste which appears on the outside of the drum/box but has not spread to the containment base or other containers), the Permittee must immediately transfer the waste from this container to a container that is in good condition or manage the waste in accordance with the approved permit application.
2. Any transfer of waste which was required to comply with I(C)(1), must be recorded in the facilities operating record.
3. Packaging of all wastes accepted for storage in the container storage area shall meet the requirements of 49 CFR 172, 178 and 179 and all applicable D.O.T. and N.F.P.A. regulations. All containers must be marked and placarded in accordance with 49 CFR 172.
4. The contents of each container shall be clearly identified on the side of the container in accordance with 49 CFR 172 prior to being placed in the container storage area.

D. Compatibility of Waste With Containers

The Permittee must use a container made of or lined with material, which will not react with, and is otherwise compatible with the waste to be stored so that the ability of the container to contain the waste is not impaired.

E. Management of Containers

The Permittee shall comply with the following management practices:

1. The following management practices apply to arrangements of containers that contain one or more containers of D001 waste.
 - a. The height and maximum total container volume are dependent, in part, on whether the container storage area has an operative and fire marshal approved fire protection system (i.e., automatic sprinklers). Prior to storing containers in accordance with I(E)(1)(a)(ii), the fire protection for the container storage area shall comply with the National Fire Protection Association's, Fire Prevention Code, NFPA 30, Flammable and Combustible Liquids Code, Section 4-6 (NFPA 30 4-6).

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- i. For the indoor container storage areas that are protected by a fire protection system approved by the fire marshal the maximum height to the top of top container(s):
 1. The maximum height shall not exceed six and one half feet to the top if any container in the stack has a flashpoint less than 100°F, or
 2. The maximum height shall not exceed the requirements of I(E)(2)(b) or I(E)(2)(c) provided all containers of waste within the arrangement have a flashpoint greater than 100°F.
 3. Each arrangement of containers shall be separated from other arrangements of containers by a four-foot aisle. The maximum volume of containers in each arrangement shall not exceed the following:
 - a. 5,000 gallons for arrangements with one or more containers of waste, which has a flashpoint less than 100°F.
 - b. 10,000 gallons for arrangements if all containers within the arrangement contain waste with a flashpoint greater than 100°F.
- ii. For outdoor container storage areas the maximum height to the top of top container(s):
 1. The maximum height shall not exceed 6.5 feet for the purpose of inspectability, unless the waste is stored in accordance with I(E)(2)(c), I(E)(2)(d) and I(E)(2)(e).
 2. Each arrangement of containers shall be separated from other arrangements by a five-foot aisle. The maximum volume of containers in each arrangement shall not exceed the following:
 - a. 2,200 gallons for arrangements with one or more containers of waste, which have a flashpoint less than 100°F.
 - b. 17,600 gallons for arrangements if all containers within the arrangement contain waste with a flashpoint greater than 100°F.

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- c. An aisle that is minimum of two and one half feet wide must be maintained within the arrangement between each row of pallets and between pallets and a wall. This is for the purpose of providing access for inspection of each container and is required in addition to the aisles separating each stack or arrangement.
2. The following management practices apply to arrangements of containers that do not include any containers holding D001 waste.
 - a. Within each arrangement of containers an aisle must be maintained between each row of pallets and between the pallets and a wall. The aisle must be a minimum of two and one half feet wide. This is for the purpose of providing access for inspection of each container.
 - b. For purposes of inspection, the height to the top of top container(s) shall not exceed six and one half feet or two containers, whichever has the greatest height, unless the waste is stored in accordance with I(E)(2)(c).
 - c. Containers may be stored a maximum height to the top of top container(s) of ten(10) feet high provided the following inspection and record keeping procedures are used:
 1. The containers shall be clearly marked with the date received prior to being placed into storage.
 2. The date on each container must be clearly visible from the ground level inspection aisle, or in the event a group of containers arrives on site shrink wrapped or banded together and are not separated prior to storage, the date may be marked on the group in lieu of each individual container, provided the date is clearly visible from the ground level inspection aisle.
 3. Each container stacked in an arrangement which is greater than 6.5 feet high shall be inspected daily for the following concerns:
 - i. Condition of the containers.
 - ii. Structural integrity of the containers.
 - iii. Signs of leakage.

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- iv. Missing bungs/tops.
 - v. Signs of corrosion.
 - vi. Stability of the pile.
 - vii. Visibility and readability of the label and date received.
- d. The inspection identified in I(E)(2)(c) above shall be conducted from a freestanding ladder, scaffold or other freestanding device, which allows the inspector to view the top of the containers (i.e. greater than 10 feet).
 - e. Containers stored longer than 90 days shall be removed from the stack and stored in accordance with I(E)(2)(b), unless a failure in the treatment system has prevented the timely processing of this waste and no additional storage space is available; in which case, the Permittee shall immediately notify the IEPA's Des Plaines office in writing indicating the date and amount of waste stored greater than 6.5 feet high, for more than 90 days, and the anticipated date this material will be restacked, treated or transported off site.
- 3. The main aisle shall be a minimum of 8 feet (96 inches) wide and access shall be maintained to all doors required for egress, including emergency exit.
 - 4. *Containers may be stacked provided that:*
 - a. Only the same size or smaller containers are stacked on top of the containers beneath; and
 - b. Containers are separated by a pallet or other dunnage to provide stability and prevent excessive stress on container walls.
 - 5. A container holding waste must always be closed during storage, except when it is necessary to sample or to add or remove waste.
 - 6. All containers of hazardous waste with a suspected flashpoint less than 100°F shall be stored in accordance with procedures:
 - a. In the event no sampling and analysis of the shipment is completed prior to placing the waste into storage, all waste shall be stored as D001 waste with a flashpoint less than 100°F.

- b. If sampling and analysis is used to determine the waste has a flashpoint above 100°F, the following procedures shall be used:
 1. A minimum of one out of every 10 drums shall be sampled from each incoming load, and at least one drum shall be sampled from each incoming load. In the event a sample is found to have a flashpoint less than 100°F, all containers received in the same shipment, which contain the same waste stream, shall be analyzed for flashpoint or stored in accordance with I(E)(6)(a).
 2. No compositing of sampling is permitted.

F. Inspection

The Permittee shall inspect the container storage area daily in accordance with the inspection schedule specified in Attachment B to this Permit. The inspection must be adequate to detect leaks and deterioration of containers and the containment system caused by corrosion or other factors. The procedures described in the approved permit application must be followed subject to the following modifications:

1. Action shall be taken to immediately overpack a leaking or deteriorating drum. Appropriate action to clean up any release of waste from a leaking or deteriorated drum shall be carried out immediately after the drum has been overpacked.
2. If a portion of the containment system is found to be in a deteriorated condition (cracks, gaps, spalling, etc.), the Permittee shall immediately remove all waste containers from the deteriorated area. No waste may be placed in the deteriorated area until the containment system has been repaired.
3. The container loading/unloading area shall be inspected daily for spills and releases. Once observed, such releases shall receive immediate attention. Results of this inspection and a description of the corrective action taken, if necessary, shall be documented in the inspection log.
4. The daily inspection shall include checking aisle spacing, height of stacks and container capacity.
5. Results of all inspections and the activities undertaken to correct deficiencies shall be documented in the facility's operating record.

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G. Containment

The Permittee shall construct, operate, and maintain the containment system according to the design plans and operating specifications contained in the approved permit application, subject to the following modifications:

1. The Permittee shall perform a complete inspection of the surface coating or lining yearly and perform annual maintenance to insure the integrity of the coating.

H. Special Requirements for Ignitable or Reactive Waste

1. The Permittee shall not locate containers, which hold ignitable waste within 50 feet of the facility's property line.
2. The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable waste.

I. Special Requirements for Incompatible Waste

1. The Permittee shall not store containers holding a material that is incompatible with any waste or other materials stored nearby, unless separated from other waste materials or protected from them by means of a dike, berm or other devices. Incompatible materials are defined in Attachment C to this permit.

J. General Operating Requirements

The Permittee shall operate the container storage area in accordance with the approved permit application, subject to the following modifications:

1. The Permittee may receive hazardous waste for storage in containers provided the following requirements are met:
 - a. The material must be a waste, which has been identified in Attachment A to this permit or the facility's current state operating permit.
 - b. The waste must be analyzed in accordance with the approved waste analysis plan.
 - c. The facility must have a special waste stream permit or generic permit to receive the waste.

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- d. The waste must be accompanied by a properly completed Illinois manifest unless the generator is (a) a conditionally exempt small quantity generator as defined in 35 Ill. Admin Code 721.105(a), (b) subject to the tolling exemption as defined in 35 Ill. Admin Code 722.120(e), or (c) otherwise exempt from manifesting requirements under Title 35 of the Illinois Administrative Code.
 - e. All containers shall be stored on pallets, elevated pads, grates, or located in an area which has been sloped to protect them from coming into contact with any accumulated liquids.
2. The Permittee shall begin removal of any precipitation, which accumulates in the secondary containment system and collection sumps of the container storage area within the same operating shift it is discovered, and complete the removal of all liquids within 24 hours.
3. All hazardous and non-hazardous special wastes generated by this facility which require further treatment or disposal off-site must be transported to the receiving facility in accordance with the applicable regulations in 35 Ill. Admin Code Parts 709, 722, 723, 807 and 809, and the Illinois EPA's special waste stream permit and manifests system.
4. The Permittee shall obtain an authorization from the Illinois EPA under the provisions of Section 39(h) of the Act for each hazardous wastes stream to be disposed in an Illinois permitted hazardous waste landfill prior to shipping the waste to the landfill. To obtain his authorization, the Permittee must demonstrate that, considering technological feasibility and economic reasonableness, the hazardous waste cannot be reasonably recycled for reuse, nor incinerated or chemically, physically or biologically treated so as to neutralize the hazardous waste and render it non-hazardous.
5. Cleanup of all spills inside the secondary containment areas must begin immediately upon discovery and be completed within 24 hours. Secondary containment must be inspected immediately after clean-up for cracks, spalling, gaps or other defects, which would allow waste to migrate to the underlying soil. If deterioration of the secondary containment system is discovered, the Permittee shall immediately remove all waste from the deteriorated area.
6. The permittee is only authorized to perform the following container management activities as described in Exhibit D-42 of the application: decanting, solids bulking, pouring off, and consolidation. The permittee is only authorized to perform these activities in the units identified in Table B-1 of the application subject to the following modifications:

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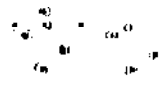
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- a. Lab packs shall not be opened, repackaged, poured-off or consolidated in the storage bays or staging areas except as specified in Conditions J.6.b and J.6.c below.
- b. The consolidation of lab packs can only occur under operating articulated arm fume extractors.
- c. The pouring-off of the containers that were in a lab pack can only occur under operating articulated arm fume extractors.
- d. Except for the consolidation of solids from lab packs under the fume hood, solids bulking or stabilization of wastes in roll-off boxes or other containers is prohibited in the proposed Container Storage Building. If AETS wishes to pursue these operations in the future, a separate permit modification must be submitted.
- e. Bulk solids may be stored in Building #2 so long as the bottom of the DOT approved bulk container (i.e., box, tote tank, flex bin, etc.) does not exceed 3 feet by 3 feet. The arrangement of pallets or bulk containers in Building #2 shall be as identified in Exhibit D-42 Figure 1. Tote tanks shall not be stocked. Roll off boxes shall not be staged or stored in Building #2.

K. Closure

At closure, all waste and waste residues must be removed from the containment system. Remaining containers, liners, bases and soil containing or contaminated with waste or waste residue must be decontaminated or removed. Closure of the container storage area shall be carried out in accordance with the closure plan in the approved permit application, as modified below:

1. The Permittee shall notify the Illinois EPA's Division of Land Pollution Control in writing of its intent to close the container storage area at least 180 days prior to the date closure is expected to begin. Along with this notification, the Permittee shall submit the sampling and analysis plan to be used in demonstrating the storage area has been properly decontaminated. Closure shall not begin without written approval from the Illinois EPA's Division of Land Pollution Control. Illinois EPA review of this plan will be subject to the permit appeal provisions contained in Sections 39(a) and 40(a) of the Act. The response from the Illinois EPA may approve and establish:
 - a. The sampling plan;
 - b. What contaminants must be analyzed for; and



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- c. The level at which decontamination is considered complete.
2. The concrete surfaces shall be visually inspected, photographed and all residues adhering to the surface must be removed by scraping and/or brushing. Following this, the concrete surfaces shall be steam cleaned and triple rinsed. All washwater and rinsate generated during the closure of these units shall also be managed as a hazardous waste, unless the Permittee can document that the waste is not hazardous as defined in 35 Ill. Admin Code 721.103.
 3. An independent, registered, professional engineer must certify that the surface has no cracks, gaps or other defects that would allow waste to migrate through to the underlying soil or an approved sampling plan must be used to establish clean closure.
 4. The Permittee shall provide post-closure care in accordance with 35 Ill. Admin Code contaminated soils cannot be practicably removed or decontaminated in accordance with the approved closure plan identified in Condition I(K)(1). If it is determined that the closure requirements cannot be met and post-closure care for the container storage area is required, this permit will be modified to require post-closure care for the container storage area, in accordance with 35 Ill. Admin. Code Sections 724.210 and 724.240.
 5. Should post-closure care, as described in Condition I(K)(4) above, become necessary, the Permittee shall submit an application for modification to this permit, including an amended closure and post-closure care plan for this unit. The application must be submitted within thirty (30) days following discovery that clean closure cannot be accomplished. If a determination is made to not pursue clean closure prior to the implementation of the closure plan for the container storage area, the modification request shall be made no later than sixty (60) days after the determination is made.
 6. Financial assurance for closure and post-closure of the container storage area, if required in accordance with Condition I(K)(4) and I(K)(5) above, shall be provided within thirty (30) days following modification of the permit.
 7. Within sixty (60) days after closure of the container storage area has been completed, the Permittee shall submit certification to the Illinois EPA that the unit has been closed in accordance with the approved closure plan. The closure certification form in Attachment G to this permit or a certification with identical wording must be used. Signatures must meet the requirements of 35 Ill. Admin Code 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover

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placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the container storage area until the Illinois EPA approves the closure certification for the unit. The Illinois EPA's review of closure certifications for partial or final closure will be conducted in accordance with 35 Ill. Admin Code 724.243.

A Closure Documentation Report must be submitted with the closure certification. This report must include the following information:

- a. The volume of waste and waste residue removed, including wastes resulting from decontamination activities;
- b. A description of the method of waste handling and transport;
- c. Copies of the waste manifests;
- d. A description of the sampling and analytical methods used;
- e. A chronological summary of closure activities and the cost involved;
- f. Tests performed, methods and results; and
- g. Color photographs of closure activities, which document conditions before, during and after closure.

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SECTION II: TANK SYSTEMS

A. SUMMARY

The Permittee may store waste as identified in Condition II.B.2 in existing (3) aboveground tanks and 36 proposed tanks in accordance with Condition II.B.1 prior to treating waste on site or bulking and transferring them to another permitted site for treatment, recycling, and/or disposal. The Permittee may also store wastes generated on site in these tanks prior to transferring them to another permitted facility for treatment, recycling or disposal.

B. WASTE IDENTIFICATION

1. The Permittee may store a total volume of 753,800 gallons of hazardous waste in the 3 existing tanks and 36 proposed tanks listed below subject to the terms of this permit:

- a. Existing Tank Systems

<u>Tank No.</u>	<u>Capacity (Gallons)</u>	<u>Dimensions of Tank (Feet-Inches)</u>	<u>Minimum Shell Thickness of Tank (Inches)</u>	<u>Type of Material</u>	<u>Status</u>
TK11	11,500	10'6"x 17'9"	0.1 (Bottom) 0.1 (Shell & Deck)	Carbon Steel	Operating
TK12	20,000	12'0"x 24'0"	0.1 (Bottom) 0.1 (Shell & Deck)	Carbon Steel	Operating
TK13*	10,000	10'0"x14'6"	0.1 (Bottom) 0.1 (Shell & Deck)	Carbon Steel	Operating

- b. Proposed Tank Systems

TK100	39,600	15'0"x 30'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK101	39,600	15'0"x 30'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK102	39,600	15'0"x 30'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK103	39,600	15'0"x 30'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK104	39,600	15'0"x 30'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed

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TK105	39,600	15'0"x 30'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK106	8,800	10'0"x 15'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK107	8,800	10'0"x 15'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK108	8,800	10'0"x 15'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK109	8,800	10'0"x 15'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK200	10,000	11'0"x 14'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Stainless Steel	Proposed
TK201	10,000	11'0"x 14'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK202	10,000	11'0"x 14'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK203	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK204	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK205	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK300	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Stainless Steel	Proposed
TK301	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Stainless Steel	Proposed
TK302	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Stainless Steel	Proposed
TK303	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Stainless Steel	Proposed
TK304	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK305	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed

TK306	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK307	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK400	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK401	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK402	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK403	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK404	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK405	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK406	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK407	21,000	12'0"x 25'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Stainless Steel	Proposed
TK408	8,800	10'0"x 15'0"	0.25 (Bottom) 0.1875 (Shell & Deck)	Stainless Steel	Proposed
TK502A	600	5'0"x 4'6"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK502B	600	5'0"x 4'6"	0.25 (Bottom) 0.1875 (Shell & Deck)	Carbon Steel	Proposed
TK503	500	(Rectangular) (Length x Width x Ht) 10'0"x 5'0"x 1'3"	0.25 (Bottom) 0.1907 (Shell & Deck)	Carbon Steel	Proposed

Note: *This tank may be placed back into service in accordance with Condition II(B)(4).

- The Permittee may store only the liquid wastes identified in Attachment A to this permit in the tanks specified above and any non-hazardous waste, which has been approved by the Illinois EPA through a supplemental waste stream permit or specifically identified in the facility's current state operating permit. All

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non-hazardous waste must be evaluated through the waste analysis plan for compatibility.

3. Storage of waste in tanks other than those specifically identified in II(B)(2) is prohibited.
4. The permittee shall repair tank TK 13 in accordance with 35 Ill. Admin. Code 724.296(f), or replace Tank TK-13 following the permit modification requirements specified in 35 Ill. Adm. Code 703.280, Appendix A, G.
5. A notification of major repairs must include a certification in accordance with 35 Ill. Admin. Code 724.296(f).

C. CONTAINMENT AND DETECTION OF RELEASES

1. The Permittee shall construct, operate, and maintain the tank system according to the detailed plans and reports contained in the approved permit application, all in accordance with 35 Ill. Admin Code 724.292(g).
2. The Permittee shall construct, maintain, and operate the secondary containment system according to the detailed design plans and descriptions contained in the approved permit application, all in accordance with 35 Ill. Admin Code 724.293 (b)-(f).
3. Closure in accordance with 35 Ill. Admin. Code 724.297 must be carried out.

D. GENERAL OPERATING REQUIREMENTS

1. The Permittee shall not place hazardous wastes in a tank system if it could cause the tank, its ancillary equipment, or the containment system to rupture, leak, corrode, or otherwise fail.
2. The Permittee shall use appropriate controls and practices to prevent spills and overflows from the tank or containment systems using the methods specified in the approved permit application.
3. The Permittee shall maintain the operating procedures specified above until RCRA closure of the hazardous waste storage tanks has been completed.
4. In the event of a leak or a spill in the tank system, the Permittee shall comply with the practices and procedures described in the approved permit application, and notify the Illinois EPA's DLPC in accordance with Condition II(G). All reported leaks or spills must be recorded in the Facility's Operating Record.

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5. The Permittee shall analyze each waste stream in accordance with the waste analysis procedures set forth in this permit and the approved permit application.
6. The Permittee shall transfer all waste received at the facility to the on-site storage tanks as soon as practicable.
7. Precipitation, which accumulates on the floor of the tank farm, shall be removed by the next operating shift after the precipitation event has ended.
8. All hazardous and non-hazardous special wastes generated by this facility and transported off-site for recycling, treatment or disposal must be transported in accordance with the special waste stream permit and Illinois manifest system, the applicable regulations in 35 Ill. Admin Code, Parts 709, 722, 723, 807 and 809, and the conditions of the applicable waste stream permits.
9. The Permittee shall obtain an authorization from the Illinois EPA under the provisions of Section 39(h) of the Act for each hazardous waste stream destined for disposal in a Illinois permitted hazardous waste landfill prior to shipping the waste to the landfill. To obtain this authorization, the generator must demonstrate that, considering technological feasibility and economic reasonableness, the hazardous waste cannot be reasonably recycled for reuse, nor incinerated or chemically, physically or biologically treated so as to neutralize the hazardous waste and render it non-hazardous.

E. TANK SYSTEM CERTIFICATION

The Permittee shall obtain and keep a copy of the written assessment of the existing tank system's integrity on file at the facility. The assessment shall be certified by an independent, qualified registered professional engineer.

F. INSPECTIONS

1. The owner or operator must inspect the tank system in accordance with the General Inspection Schedule in Attachment B to this Permit.
2. The Permittee shall inspect the existing and new tanks every five years to assess their condition. This inspection shall include the procedures described in the approved permit application, subject to the following modifications:
 - a. An interior visual inspection and thickness testing shall be included in the inspection. During this inspection, the interior surface shall be inspected for indentations, cracks, corrosion, weld breaks, aging, and thin areas. Corrective

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action, as specified by the manufacturer of these tanks, shall be taken if the internal inspection indicates that the interior surface of a tank system has been detrimentally affected by the hazardous wastes, which have been stored in it.

- b. A leak test or other integrity assessment as approved by the Illinois EPA shall be conducted annually on all ancillary equipment which cannot be inspected daily.
- c. A qualified, independent registered professional engineer shall certify the inspection of each tank system.
- d. All waste and wash water generated during evacuation of a tank shall be managed as a special waste.
- e. The inspection procedures and results of the inspection shall be submitted to the Illinois EPA's DLPC within sixty (60) days of the inspection date and shall also be included in the operating record of this facility.
- f. The procedures set forth in 35 Ill. Admin Code 724.296 shall be followed if the results of these inspections indicate a tank system is leaking.
- g. Appropriate action shall be taken if excessive corrosion or deterioration of a tank is observed, in accordance with 35 Ill. Admin Code 724.296.
- h. All permitted tanks must be inspected at least every five years. In the event the inspection identified in Condition II(G)(2) indicates a failure may occur prior to the next 5-year inspection, the next inspection shall take place 1 year prior to the estimated date of failure.

G. REPORTING AND RECORDKEEPING

- 1. The Permittee shall report all leaks or spills which occur in the tank system or secondary containment system to the Illinois EPA within 24 hours, in accordance with the requirement of 35 Ill. Admin Code 724.296(d).
- 2. Within thirty (30) days of detecting a release to the environment from the tank system or secondary containment system, the Permittee shall report the following information to the Illinois EPA:
 - a. Likely route of migration of the release;

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- b. Characteristics of surrounding soil (including soil composition, geology, hydrogeology and climate);
- c. Results of any monitoring or sampling conducted in connection with the release;
- d. Proximity to down gradient drinking water, surface water and populated areas; and
- e. Description of response actions taken or planned.

H. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES

1. The Permittee shall not place ignitable waste in the tank system, unless the procedures specified in the Approved Permit Application are followed.
2. The Permittee shall comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code." (1987)
3.
 - a) Ignitable or reactive waste must not be placed in tank systems unless the following is true:
 - 1) The waste is treated, rendered, or mixed before or immediately after placement in the tank system so that the following is true:
 - A) The resulting waste, mixture, or dissolved material no longer meets the definition of ignitable or reactive waste under 35 Ill. Adm. Code 721.121 or 721.123; and
 - B) Section 724.117(b) is complied with; or
 - 2) The waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite or react; or
 - 3) The tank is used solely for emergencies.
 - b) The owner or operator of a facility where ignitable or reactive waste is stored or treated in a tank must comply with the requirements of the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon, as required in tables 2-1 through 2-6 and table 5-3.1.1 of the National Fire Protection Association's "Flammable and Combustible Liquids Code," NFPA 30, incorporated by reference in 35 Ill. Adm. Code 720.111).

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I SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES

1. The Permittee shall not place incompatible wastes together in the same tank system.
2. The facility shall not store waste in a tank, which previously held an incompatible waste, unless the tank system has been decontaminated. Incompatible wastes are contained in Attachment C of the Permit.

J. CLOSURE

At closure, all waste and waste residues must be removed from tanks, discharge control equipment and discharge confinement structures. The remaining tanks, containment systems, bases and soil containing or contaminated with waste or waste residue must be decontaminated or removed. Closure of the tank storage area shall be carried out in accordance with the closure plan in the approved permit application, subject to the following modifications:

1. The Permittee shall notify the Illinois EPA's Division of Land Pollution Control in writing of its intent to close the tank system at least 180 days prior to the date closure is expected to begin. Along with this notification, the Permittee shall submit the sampling and analysis plan to be used in demonstrating that the tank system has been properly decontaminated. This plan must not be implemented prior to approval by the Illinois EPA's Division of Land Pollution Control. Illinois EPA review of this plan will be subject to the permit appeal provisions contained in Sections 39(a) and 40(a) of the Act. The response from the Illinois EPA may approve and establish:
 - a. The sampling plan;
 - b. What contaminants must be analyzed for; and
 - c. The level at which decontamination is considered complete.
2. The concrete surfaces shall be visually inspected, photographed and any residue adhering to the surface must be removed by scraping and/or brushing. Following this, the concrete surfaces must be steam cleaned and triple rinsed. All wash and rinse water shall be collected. For new secondary containment systems which meet the requirements of 35 Ill. Admin Code 724.293 at the time of installation the secondary containment must be certified by an independent, registered, professional engineer indicating that the surface has no cracks, gaps or other defects which would allow waste to migrate through to the underlying soil. If such a certification cannot be made, soil sampling and analysis must be conducted to establish clean closure.

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3. Sweepings collected during closure of any tank system shall be managed as a hazardous waste. All wash water and rinsate generated during the closure of these units shall also be managed as a hazardous waste, unless the facility can document that it is not hazardous as defined in 35 Ill. Admin Code 721.103.
4. Subject to Condition II(J)(1) above, all samples shall be analyzed individually (i.e., no compositing). Sampling and analytical procedures shall be conducted in accordance with the latest edition of SW-846 and Attachment G to this Illinois EPA's closure plan instruction package. Sample size per interval shall be minimized to prevent dilution of any contamination. Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed. To demonstrate a parameter is not present in a sample, analysis results must show a detection limit at least as low as the PQL for that parameter as identified in the latest edition of SW-846.
5. The Permittee shall provide post-closure care in accordance with 35 Ill. Admin Code, Part 724, Subpart G for any tank system which cannot be closed in accordance with 35 Ill. Admin Code 724.297(a) (i.e., "clean closure") as specified in this permit and in the approved closure plan. In the event that these closure requirements cannot be met and post-closure care is required, the tank system shall be closed as a landfill and the contingent post-closure care must be implemented for the affected tank system, in accordance with 35 Ill. Admin Code 724, Subparts G and H.
6. Should post-closure care, as described in Condition II(J)(5) above, become necessary, the Permittee shall submit an application for modification to this permit, including an amended closure and post-closure care plan for the affected tank system. The modification must be submitted within the first thirty (30) days following discovery that clean closure cannot be accomplished. If the Permittee determines not to pursue clean closure prior to the implementation of the closure plan, the modification request, shall be made no later than sixty (60) days after the determination is made.
7. Financial assurance for the modification of the closure and post-closure plan for any tank system as described in II(J)(5) or II(J)(6) above, shall be provided within the first thirty (30) days following the approval of the modification.
8. No later than sixty (60) days after closure of any tank system is complete, the Permittee shall submit a closure certification to the Illinois EPA, which indicates that the unit has been closed in accordance with the approved closure plan. The closure certification form in Attachment G to this permit or a certification with identical wording must be used. Signatures must meet the requirements of 35 Ill. Admin. Code, Section 702.126. The independent registered professional engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal,

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backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for each tank system identified in Condition II(B)(1) above until the Illinois EPA approves the closure certification for the unit. The Illinois EPA's review of closure certifications for partial or final closure will be conducted in accordance with 35 Ill. Admin Code 724.243.

A Closure Documentation Report must be submitted with the closure certification. This report must include the following information:

- a. The volume of waste and waste residue removed, including wastes resulting from decontamination activities;
- b. A description of the method of waste handling and transport;
- c. Copies of the waste manifests;
- d. A description of the sampling and analytical methods used;
- e. A chronological summary of closure activities and the cost involved;
- f. Tests performed, method and results; and
- g. Color photographs of closure activities, which document conditions before, during and after closure.

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SECTION III - STANDARD CONDITIONS

GENERAL REQUIREMENTS

1. **EFFECT OF PERMIT.** The existence of a RCRA permit shall not constitute a defense to a violation of the Environmental Protection Act or Subtitle G, except for development, modification or operation without a permit. Issuance of this permit does not convey property rights or any exclusive privilege. Issuance of this permit does not authorize any injury to persons or property or invasion of other private rights, or infringement of state or local law or regulations, (35 Ill. Admin Code Section 702.181).
2. **PERMIT ACTIONS.** This permit may be modified, reissued or revoked for cause as specified in 35 Ill. Admin Code Sections 703.270 through 703.273 and Section 702.186. The filing of a request by the Permittee for a permit modification or revocation, or a notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition, (35 Ill. Admin Code Section 702.146).
3. **SEVERABILITY.** The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby, (35 Ill. Admin Code Section 700.107).
4. **PERMIT CONDITION CONFLICT.** In case of conflict between a special permit condition and a standard condition, the special condition will prevail, (35 Ill. Admin Code Section 702.160).
5. **DUTY TO COMPLY.** The Permittee shall comply with all conditions of this permit except for the extent and for the duration an emergency permit authorizes such noncompliance. Any permit noncompliance constitutes a violation of the Environmental Protection Act and is grounds for enforcement action; permit revocation or modification; or for denial of a permit renewal application, (35 Ill. Admin Code Sections 702.141 and 703.242).
6. **DUTY TO REAPPLY.** If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must apply for a new permit at least 180 days before this permit expires, unless the Illinois EPA has granted permission for a later date, (35 Ill. Admin Code Sections 702.142 and 703.125).

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7. **PERMIT EXPIRATION.** This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 35 Ill. Admin Code Sections 703.181-703.209) and through no fault of the Permittee the Illinois EPA has not issued a new permit as set forth in 35 Ill. Admin Code Section 702.125.
8. **NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE.** It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit, (35 Ill. Admin Code Section 702.143).
9. **DUTY TO MITIGATE.** In the event of noncompliance with the permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment, (35 Ill. Admin Code Section 702.144).
10. **PROPER OPERATION AND MAINTENANCE.** The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory, and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit, (35 Ill. Admin Code Section 702.145).
11. **DUTY TO PROVIDE INFORMATION.** The Permittee shall furnish to the Illinois EPA, within a reasonable time, any relevant information which the Illinois EPA may request to determine whether cause exists for modifying, revoking and reissuing or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Illinois EPA, upon request, copies of records required to be kept by this permit, (35 Ill. Admin Code Section 702.148).
12. **INSPECTION AND ENTRY.** The Permittee shall allow an authorized representative of the Illinois EPA, upon the presentation of credentials and other documents as may be required by law, to:
 - a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

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- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the appropriate Act, any substances or parameters at any location, (35 Ill. Admin Code Section 702.149).

13. MONITORING AND RECORDS. (35 Ill. Admin Code Section 702.150)

- a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste must be the appropriate method from Appendix A of 35 Ill. Admin Code Part 721. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, latest versions; Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, latest versions; or an equivalent method as specified in the approved Waste Analysis Plan.
- b. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or application. These periods may be extended by request of the Illinois EPA at any time. The Permittee shall maintain records from all groundwater monitoring wells and associated groundwater surface elevations, for the active life of the facility, and for disposal facilities for the post-closure care period as well.
- c. Records of monitoring information shall include:
 - i. The date(s), exact place, and time of sampling or measurements;
 - ii. The individual(s) who performed the sampling or measurements;
 - iii. The date(s) analyses were performed;
 - iv. The individual(s) who performed the analyses;
 - v. The analytical technique(s) or method(s) used; and
 - vi. The result(s) of such analyses, (35 Ill. Admin Code Section 702.150).

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14. **REPORTING PLANNED CHANGES.** The Permittee shall give notice to the Illinois EPA as soon as possible of any planned physical alterations or additions to the permitted facility. For a new HWM facility, the Permittee may not commence treatment, storage or disposal of hazardous waste; and for a facility being modified the Permittee may not treat, store or dispose of hazardous waste in the modified portion of the facility, until:
- a. The Permittee has submitted to the Illinois EPA by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
 - b.
 - 1. The Illinois EPA has inspected the modified or newly constructed facility and finds it is in compliance with the condition of the permit; or
 - 2. If, within 15 days of the date of submission of the letter in paragraph (a), the Permittee has not received notice from the Illinois EPA of its intent to inspect, prior inspection is waived and the Permittee may commence treatment, storage or disposal of hazardous waste, (35 Ill. Admin Code Sections 703.247 and 702.152(a)).
15. **ANTICIPATED NONCOMPLIANCE.** The Permittee shall give advance notice to the Illinois EPA of any planned changes in the permitted facility or activity, which may result in noncompliance with permit requirements. For a new facility, the Permittee shall not treat, store or dispose of hazardous waste; and for a facility being modified; the Permittee shall not treat, store or dispose of hazardous waste in the modification portion of the facility, except as provided in 35 Ill. Admin Code Section 703.280, until:
- a. The Permittee has submitted to the Illinois EPA by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
 - b. Either:
 - i. The Illinois EPA has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or
 - ii. Within 15 days after the date submission of the letter in section (i) above, the Permittee has not received notice from the Illinois EPA of its intent to inspect; the Permittee may commence treatment, storage or disposal of hazardous waste, (35 Ill. Admin Code Sections 702.152(b) and 703.247).

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16. **TRANSFER OF PERMITS.** This permit is not transferable to any person except after notice to the Illinois EPA. The Illinois EPA may require modification of the permit to change the name of the Permittee and incorporate such other requirements as may be necessary under the appropriate Act, (See 35 Ill. Admin Code Sections 703.260 and 703.270), in some cases modification is mandatory (35 Ill. Admin Code Section 702.152(c)).
17. **MONITORING REPORTS.** Monitoring results shall be reported at the intervals specified in the permit, (35 Ill. Admin Code Section 702.152(d)).
18. **COMPLIANCE SCHEDULES.** Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than specified in 35 Ill. Admin Code Section 702.162, (35 Ill. Admin Code Section 702.152(e)).
19. **TWENTY-FOUR HOUR REPORTING.**
 - a. The Permittee shall report to the Illinois EPA any noncompliance with the permit, which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the following circumstances. This report shall include the following:
 - i. Information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies.
 - ii. Information concerning the release or discharge of any hazardous waste or of a fire or explosion at the HWM facility, which could threaten the environment or human health outside the facility.
 - b. The description of the occurrence and its cause shall include:
 - i. Name, address, and telephone number of the owner or operator;
 - ii. Name, address, and telephone number of the facility;
 - iii. Date, time, and type of incident;
 - iv. Name and quantity of material(s) involved;
 - v. The extent of injuries, if any;

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- vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where applicable; and
 - vii. Estimated quantity and disposition of recovered material that resulted from the incident.
- c. A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance including exact dates and times and if the noncompliance has not been corrected; the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Illinois EPA may waive the five-day written notice requirement in favor of a written report within fifteen days, (35 Ill. Admin Code Sections 702.152(f) and 703.245(b)).
20. **OTHER NONCOMPLIANCE.** The Permittee shall report all instances of noncompliance not otherwise required to be reported under Standard Conditions 17, 18, and 19, at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in Standard Condition 19, (35 Ill. Admin Code Section 702.152(g)).
21. **OTHER INFORMATION.** Where the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Illinois EPA, the Permittee shall promptly submit such facts or information, (35 Ill. Admin Code Section 702.152(h)).
22. **REPORTING REQUIREMENTS.** The following reports required by 35 Ill. Admin Code Part 724 shall be submitted in addition to those required by 35 Ill. Admin Code Section 702.152 (reporting requirements):
- a. **Manifest discrepancy report:** if a significant discrepancy in a manifest is discovered, the Permittee must attempt to reconcile the discrepancy with the waste generator or transporter. If the discrepancy is not resolved within 15 days after receiving the waste, the Permittee must immediately submit to the Illinois EPA a letter describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper at issue, (35 Ill. Admin Code Section 724.172(b)).
 - b. **Unmanifested waste report:** The Permittee must submit to the Illinois EPA within 15 days of receipt of unmanifested waste an unmanifested waste report on EPA form 8700-13B, (35 Ill. Admin Code Section 724.176).

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- c. **Annual report:** An annual report must be submitted covering facility activities during the previous calendar year, (35 Ill. Admin Code Section 724.175).

23. SUBMITTAL OF REPORTS OR OTHER INFORMATION. All written reports or other written information required to be submitted by the terms of this permit shall be sent to:

Illinois Environmental Protection Agency
Division of Land Pollution Control #24
Annual Report and Manifest Unit
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

- 24. SIGNATORY REQUIREMENT.** All permit applications, reports or information submitted to the Illinois EPA shall be signed and certified as required by 35 Ill. Admin Code Section 702.126, (35 Ill. Admin Code Section 702.151).
- 25. CONFIDENTIAL INFORMATION.** Any claim of confidentiality must be asserted in accordance with 35 Ill. Admin Code Section 702.103, and 35 Ill. Admin Code Section 161.
- 26. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE.** The Permittee shall maintain at the facility, until closure is complete, the following documents and amendments, revisions and modifications to these documents:
- a. Waste analysis plan as required by 35 Ill. Admin Code Section 724.113(b), and this permit;
 - b. Personnel training documents and records as required by 35 Ill. Admin Code Section 724.116(d), and this permit;
 - c. Contingency plan as required by 35 Ill. Admin Code Section 724.153(a), and this permit;
 - d. Closure plan as required by 35 Ill. Admin Code Section 724.212(a), and this permit;
 - e. Cost estimate for facility closure as required by 35 Ill. Admin Code Section 724.242(d), and this permit;
 - f. Operating record as required by 35 Ill. Admin Code Section 724.173, and this permit;

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and

- g. Inspection schedules as required by 35 Ill. Admin Code Section 724.115(b), and this permit.

27. **WASTE MINIMIZATION.** The Permittee shall certify at least annually that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the Permittee to be economically practicable, and the proposed method of treatment, storage, or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment, in accordance with 35 Ill. Admin Code Section 724.173(b)(9).

GENERAL FACILITY STANDARDS

28. **NOTICE OF WASTE FROM A FOREIGN SOURCE.** The Permittee who has arranged to receive hazardous waste from a foreign source must notify the Illinois EPA in writing at least four weeks in advance of the date the waste is expected at the facility, (35 Ill. Admin Code Section 724.112(a)).
29. **NOTICE OF WASTE FROM OFF-SITE.** The Permittee who receives hazardous waste from an off-site source (except where the Permittee is also the generator), must inform the generator in writing that the Permittee has the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the facility operating record, (35 Ill. Admin Code Section 724.112(b)).
30. **GENERAL WASTE ANALYSIS.** The Permittee shall comply with the procedures described in the approved waste analysis plan, (35 Ill. Admin Code Section 724.113).
31. **SECURITY.** The Permittee shall comply with the security provisions of 35 Ill. Admin Code Sections 724.114(b) and (c).
32. **GENERAL INSPECTION REQUIREMENTS.** The Permittee shall follow the approved inspection schedule. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 35 Ill. Admin Code Section 724.115(c). Records of inspections shall be kept as required by 35 Ill. Admin Code Section 724.115(d).
33. **PERSONNEL TRAINING.** The Permittee shall conduct personnel training as required by 35 Ill. Admin Code Section 724.116 and shall maintain training documents and records as required by 35 Ill. Admin Code Sections 724.116(d) and (e).

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34. **GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE.** The Permittee shall comply with the requirements of 35 Ill. Admin Code Section 724.117.

PREPAREDNESS AND PREVENTION

35. **DESIGN AND OPERATION OF FACILITY.** The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment, (35 Ill. Admin Code Section 724.131).
36. **REQUIRED EQUIPMENT.** The Permittee shall equip the facility with the equipment set forth in the approved contingency plan, as required by 35 Ill. Admin Code Section 724.132.
37. **TESTING AND MAINTENANCE OF EQUIPMENT.** The Permittee shall test and maintain the equipment specified in condition 36 as necessary to assure its proper operation in time of emergency. Such testing and maintenance activities are set forth in the approved inspection schedule, (35 Ill. Admin Code Section 724.133).
38. **ACCESS TO COMMUNICATIONS OR ALARM SYSTEM.** The Permittee shall maintain access to the communications or alarm system as required by 35 Ill. Admin Code Section 724.134.
39. **REQUIRED AISLE SPACE.** The Permittee shall maintain aisle space as required by 35 Ill. Admin Code Section 724.135 and National Fire Protection Association (NFPA) requirements.
40. **ARRANGEMENTS WITH STATE AND LOCAL AUTHORITIES AND EMERGENCY RESPONSE CONTRACTORS.** The Permittee shall attempt to make emergency response arrangements with State and local authorities and agreements with State emergency response teams and emergency response contractors and equipment suppliers as required by 35 Ill. Admin Code Section 724.137. If State or local officials refuse to enter in preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

CONTINGENCY PLAN

41. **IMPLEMENTATION OF PLAN.** The provisions of the contingency plan must be carried out by the Permittee immediately whenever there is a fire, explosion or release of hazardous waste or hazardous waste constituents which could threaten human health or the

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environment (35 Ill. Admin Code Section 724.151(b)). Within 15 days of any incident that requires implementation of the contingency plan, the owner or operator must submit a written report to the Illinois EPA as required by 35 Ill. Admin Code Section 724.156(j).

42. **COPIES OF PLAN.** A copy of the contingency plan, including any revisions, must be maintained at the facility and submitted to all local police and fire departments, hospitals and state and local emergency response teams as required by 35 Ill. Admin Code Section 724.153.
43. **AMENDMENTS TO PLAN.** The Permittee shall review and immediately amend the contingencies plan, if necessary, as required by 35 Ill. Admin Code Section 724.154.
44. **EMERGENCY COORDINATOR.** A trained emergency coordinator shall be available at all times in case of an emergency as required by 35 Ill. Admin Code Sections 724.155 and 724.156.

MANIFEST SYSTEM RECORD KEEPING AND REPORTING

45. **MANIFEST SYSTEM.** The Permittee shall comply with the manifest requirements of 35 Ill. Admin Code Sections 724.171, 724.172 and 724.176.
46. **OPERATING RECORD.** The Permittee shall maintain a written operating record at the facility in accordance with 35 Ill. Admin Code Section 724.173.
47. **ANNUAL REPORT.** The Permittee shall prepare and submit an annual report to the Illinois EPA prior to March 1st of each year in accordance with the requirements of 35 Ill. Admin Code Section 724.175.

CLOSURE

48. **PERFORMANCE STANDARD.** The Permittee shall close the facility as required by 35 Ill. Admin Code Section 724.211, and in accordance with the approved closure plan.
49. **AMENDMENT TO CLOSURE PLAN.** The Permittee must amend the closure plan whenever there is a change in the expected year of closure or whenever a change in the facility operation plans or facility design affects the closure plan pursuant to 35 Ill. Admin Code Section 724.212(c).
50. **NOTIFICATION OF CLOSURE.** The Permittee shall notify the Illinois EPA at least 60 days prior to the date it expects to begin closure, (35 Ill. Admin Code Section 724.212(d)).

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51. **TIME ALLOWED FOR CLOSURE.** After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste and complete closure activities in accordance with the schedule(s) specified in the closure plan, (35 Ill. Admin Code Section 724.213).
52. **DISPOSAL AND/OR DECONTAMINATION OF EQUIPMENT.** When closure is completed, the Permittee shall decontaminate and/or dispose of all facility equipment and structures as required by the approved closure plan, (35 Ill. Admin Code Section 724.214).
53. **CERTIFICATION OF CLOSURE.** When closure is completed, the Permittee shall submit certification to the Illinois EPA in accordance with 35 Ill. Admin Code Section 724.215 that the facility has been closed as specified by the approved closure plans.
54. **COST ESTIMATE FOR FACILITY CLOSURE.** The Permittee's original closure cost estimate, prepared in accordance with 35 Ill. Admin Code Section 724.242, must be:
 - a. Adjusted for inflation either 60 days prior to each anniversary of the date on which the first closure cost estimate was prepared or if using the financial test or corporate guarantee, within 30 days after close of the firm's fiscal year.
 - b. Revised whenever there is a change in the facility's closure plan increasing the cost of closure.
 - c. Kept on record at the facility and updated, (35 Ill. Admin Code Section 724.242).
55. **FINANCIAL ASSURANCE FOR FACILITY CLOSURE.** The Permittee shall demonstrate compliance with 35 Ill. Admin Code Section 724.243 by providing documentation of financial assurance, as required by 35 Ill. Admin Code Section 724.251, in at least the amount of the cost estimates required by the previous Permit Condition. The Illinois EPA pursuant to 35 Ill. Admin Code Section 724.243 must approve changes in financial assurance mechanisms.
56. **LIABILITY REQUIREMENTS.** The Permittee shall demonstrate continuous compliance with the requirements of 35 Ill. Admin Code Section 724.247 and the documentation requirements of 35 Ill. Admin Code Section 724.251.
57. **INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS.** The Permittee shall comply with 35 Ill. Admin Code Section 724.248 whenever necessary.

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LAND DISPOSAL RESTRICTIONS

- 58. DISPOSAL PROHIBITION.** Any waste identified in 35 Ill. Admin Code Part 728, Subpart C, or any mixture of such a waste with nonrestricted wastes, is prohibited from land disposal unless it meets the standards of 35 Ill. Admin Code Part 728, Subpart D, or unless it meets the requirements for exemptions under Subpart C. "Land disposal" means placement in or on the land and includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, or vault intended for disposal.
- 59. DILUTION PROHIBITION.** The Permittee shall not in any way dilute a restricted waste or residual from treatment of a restricted waste as a substitute for adequate treatment in order to achieve compliance with 35 Ill. Admin Code Part 728, Subpart D, (35 Ill. Admin code Section 728.103).
- 60. WASTE ANALYSIS.**
1. The Permittee must test his waste or extract developed, using the test method identified in Appendix I of 40 CFR Part 268, or use knowledge of the waste, to determine if the waste is restricted from land disposal.
 2. For any waste with treatment standards expressed as concentrations in the waste extract, the Permittee must test the treatment residues or an extract of such residues developed using the test method described in Appendix I of 40 CFR Part 268, to assure that the treatment residues or extract meet the applicable treatment standard.
 3. If the treatment residues do not meet the treatment standards, or if the Permittee ships any restricted wastes to a different facility, the Permittee shall comply with the requirements applicable to generators in 35 Ill. Admin Code Sections 728.107 and 728.150(a)(1).
- 61. STORAGE RESTRICTIONS**
1. The Permittee shall not store hazardous wastes restricted from land disposal under 35 Ill. Admin Code Part 728, Subpart C unless such wastes are stored only in containers or tanks, and are stored solely for the purpose of the accumulation of such quantities as is necessary to facilitate proper recovery, treatment, or disposal, and: (1) each container is clearly marked to identify its contents and the date each period of accumulation begins; (2) each tank is clearly marked to identify its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, as required by 35 Ill. Admin Code Section 728.150.

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2. The Permittee must comply with the operating record requirements of 35 Ill. Admin Code Section 724.173.

62. NEW DETERMINATIONS OF PROHIBITED WASTES

Wastes which are prohibited from land disposal under 35 Ill. Admin Code Part 728, Subpart C, or for which treatment standards have been established under 35 Ill. Admin Code Part 728, Subpart D, subsequent to the date of issuance of this permit, shall be subject to the conditions number 58 through 61 above.

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SECTION IV: CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS

A. INTRODUCTION

1. In accordance with Section 3004(u) of RCRA and 35 Ill. Adm. Code 724.201, the Permittee shall institute such corrective action as necessary to protect human health and the environment from all releases of hazardous wastes or hazardous constituents, listed in 35 Ill. Adm. Code 721, Appendix H from any solid waste management unit (SWMU) at its facility in Alsip, Illinois.
2. The original RCRA permit for the facility required that corrective action (investigation and as necessary, remediation) be carried out at the following SWMUs:
 1. Truck Pads 1, 2 and 3;
 2. Truck Pad 5;
 3. Form Spill Collection UST;
 4. Former UST Fuel Oil Tanks;
 5. Tank No. 4;
 6. Drum Storage Area;
 7. West Sump (Sump No. 1);
 8. East Sump (Sump No. 2);
 9. Maintenance Room Grip Trap;
 10. Exchanger Cleaning Sump.
3. The corrective action requirements of 35 Ill. Admin. Code 724.201 have yet to be met at the SWMUs identified above, although a substantial amount of investigative and remedial efforts have been completed at the unit. Thus, this permit sets forth procedures which must still be carried out to ensure the requirements of 35 Ill. Adm. Code 724.201 are met at these units.

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4. The Permittee must provide corrective action, as appropriate, for any future releases from SWMUs present at the facility.
5. The requirements of 35 Ill. Adm. Code 742 must be met in determining remediation objectives for all corrective action activities.

B. CORRECTIVE ACTION REQUIREMENTS FOR THE TEN SOLID WASTE MANAGEMENT UNITS

1. A substantial amount of corrective action efforts have been completed to date at this facility; a summary of these activities is provided in Attachment D of this permit. A RCRA Facility Investigation has been completed, as well as a soil remediation effort via bio-venting. In an August 30, 1999 letter, Illinois EPA determined that the soils being addressed in this program had been adequately remediated.
2. The Permittee must continue to operate a Groundwater Management Zone (GMZ) program in accordance with the requirements of this permit. The GMZ was approved in an Illinois EPA February 6, 1996 letter. As required by regulation 35 Ill. Adm. Code 620.250(c), a review of the on-going adequacy of controls and continued management at the site must be conducted no less often than every five years. The review must be presented to the Illinois EPA in a written report. Guidance for "Re-evaluation of a Groundwater Management Zone at RCRA Facilities" can be found on the Illinois EPA's website: <http://www.epa.state.il.us>.
3. Groundwater at the facility has been determined to be Class I in accordance with 35 Ill. Adm. Code 620. Therefore all future comparisons of analytical data must be made to 35 Ill. Adm. Code 620, Class I, Groundwater Quality Standards and/or 35 Ill. Adm. Code 742 Tier 1, Class I Groundwater Remediation Objectives.
4. Future corrective action efforts carried out at this site must be carried out in accordance with plans and reports previously approved by Illinois EPA (see Attachment F for a listing of these documents). If the Permittee desires to modify these approved activities, then a written request to make such a modification must be submitted to Illinois EPA for review and approval.
5. Overall corrective action efforts at this facility must meet the requirements of 35 Ill. Adm. Code 620.724 and 742.
6. It must be noted that the Tank 4 (SWMU 5) is also a former interim status unit subject to an interim status closure plan approved by Illinois EPA (Log No. C-503 and

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associated modifications). Closure of this unit is being coordinated with the corrective action efforts being carried out at this facility. Closure of Tank 4 will be deemed complete whenever the corrective action efforts required by this subsection have been fully completed.

C. INTERIM MEASURES

At any time during the course of this permit, the Permittee may initiate interim measures for the purpose of preventing continuing releases and/or mitigating the results of releases and/or mitigating the migration of hazardous wastes or hazardous constituents. It shall not be necessary to conduct all phases of an investigation prior to implementing an interim measure if the Illinois EPA and the Permittee agree that a problem can be corrected, or a release cleaned up, without additional study and/or without a formal corrective measures study.

1. Prior to implementing any interim measures, the Permittee must submit detailed information regarding the proposed interim measure to the Illinois EPA for approval. This information shall include, at a minimum:
 - a. Objectives of the interim measures: how the measure is mitigating a potential threat to human health and the environment and/or is consistent with and integrated into any long-term solution at the facility;
 - b. Design, construction, and maintenance requirements;
 - c. Schedules for design and construction; and
 - d. Schedules for progress reports.
2. If the Illinois EPA determines that a release cannot be addressed without additional study and/or a formal CMS, then the Illinois EPA will notify the Permittee that these must be performed. Any proposal made under this provision or any other activity resulting from such proposal shall not affect the schedule for implementation of any other portion of the permit.
3. If the Illinois EPA determines that interim measures are necessary to protect human health or the environment, the Permittee will be notified by way of a permit modification.

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D. NOTIFICATION REQUIREMENTS FOR AN ASSESSMENT OF NEWLY- IDENTIFIED SOLID WASTE MANAGEMENT UNIT(S)

1. The Permittee shall notify the Illinois EPA in writing of any newly-identified SWMU(s) discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, no later than sixty (60) calendar days after discovery. The notification shall provide the following information, as available:
 - a. The location of the newly-identified SWMU in relation to other SWMUs on a scaled map or drawing;
 - b. The type and past and present function of the unit;
 - c. The general dimensions, capacities, and structural description of the unit (available drawings and specifications provided);
 - d. The period during which the unit was operated;
 - e. The specifics on all materials, including but not limited to, wastes and hazardous constituents, that have been or are being managed at the SWMU, to the extent available; and
 - f. The results of any relevant available sampling and analysis which may aid in determining whether releases of hazardous wastes or hazardous constituents have occurred or are occurring from the unit.
2. If the submitted information demonstrates a potential for a release of hazardous waste or hazardous waste constituents from the newly identified SWMU, the Illinois EPA may request in writing, that the Permittee prepare a Solid Waste Management Unit (SWMU) Assessment Plan and a proposed schedule of implementation and completion of the Plan for any additional SWMU(s) discovered subsequent to the issuance of this Permit. Guidance for the development of a SWMU assessment plan will be provided in Illinois EPA's written request for such a plan.

This SWMU Assessment plan must propose investigations, including field investigations if necessary, to determine the release potential to specific environmental media for the newly-identified SWMU. The SWMU Assessment Plan must demonstrate that the sampling and analysis program, if applicable, is capable of yielding representative samples and must include parameters sufficient to identify

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migration of hazardous waste and hazardous constituents from the newly-discovered SWMU(s) to the environment.

3. The Illinois EPA shall either approve, approve with conditions or disapprove the Plan in writing. If the plan is approved, the Permittee shall begin to implement the Plan within forty-five (45) calendar days of receiving such written notification. If the Plan is disapproved, the Illinois EPA shall notify the Permittee in writing of the Plan's deficiencies and specify a due date for submittal of a revised plan.
4. The Permittee shall submit a report documenting the results of the approved SWMU Assessment Plan to the Illinois EPA in accordance with the schedule in the approved SWMU Assessment Plan. The SWMU Assessment Report shall describe all results obtained from the implementation of the approved SWMU Assessment Plan.
5. Additional investigation, and corrective measures as necessary, shall be carried out to ensure the requirements of 35 Ill. Adm. Code 724.201 are met. Further guidance regarding compliance with these requirements will be provided as necessary. The requirements of 35 Ill. Adm. Code 742 must also be met.
6. All Illinois EPA action on newly-identified SWMUs are subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act.

E. FUTURE RELEASES FROM SWMUs

There exists a potential that a release may occur in the future from SWMUs identified in the RFA or RFI which did not require any corrective action at the time that the RFA or RFI was completed. If the Permittee discovers that a release has occurred from such a SWMU in the future, then the Illinois EPA must be notified of this release within sixty (60) days after its discovery. This notice must contain the information identified in Subsection D above. Upon the Illinois EPA's written request, the Permittee shall determine the nature and extent of the contamination by following the procedures set forth in Section H above. All Illinois EPA action on such future releases shall be subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act.

F. FINANCIAL ASSURANCE

35 Ill. Adm. Code 724.201 requires that financial assurance be established for completing required corrective action at solid waste management units:

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1. The current cost estimate for completing corrective action at this facility is \$89,870 (in 2003 dollars). This estimate include the cost of completing closure of Tank 4 as required by 35 Ill. Adm. Code 725.
2. The Permittee shall demonstrate compliance with the financial assurance requirements of 35 Ill. Adm. Code 724.201 by providing documentation of financial assurance using a mechanism specified in 35 Ill. Adm. Code 724.243, in at least the amount of the approved corrective action cost estimate. The words "completion of corrective action" shall be substituted for "closure and/or post-closure", as appropriate in the financial instrument specified in 35 Ill. Adm. Code 724.251. The Illinois EPA may accept financial assurance for completion of corrective action in combination with another financial mechanism that is acceptable under 35 Ill. Adm. Code 724.246 at its discretion.
3. Financial assurance for corrective action must be updated, as necessary, to reflect the current status of the RCRA corrective action program at this facility. Requests to modify the approved amount of financial assurance must be accomplished by a detailed estimate of the cost for completing the remaining corrective action responsibilities at the facility. The estimate must be based on the cost of hiring "third-party" to carry out the required activities. This detailed estimate must include: (1) the estimated costs of each task necessary to complete corrective action; (2) the actual amount of resources needed to complete each task, as well as the unit cost associated with each required resource; and (3) justification for all values used in developing the cost estimate.
4. The financial assurance requirements of 35 Ill. Adm. Code 724.201 must also be met for any investigative or corrective action efforts carried out in accordance with Subsections D or E above. Detailed cost estimates must be developed for any activities carried out under this Section and must accompany any workplan/report submitted to Illinois EPA for review and approval. Appropriate documentation of financial assurance in at least the amount of the approved cost estimate must be submitted to Illinois EPA within 60 days after the cost estimates are approved.

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SECTION V: REPORTING AND NOTIFICATION REQUIREMENTS

The reporting and notification requirements of each section of the RCRA permit are summarized below. This summary is provided to highlight the various reporting and notification requirements of this permit.

<u>Condition</u>	<u>Submittal</u>	<u>Due Date</u>
<u>SECTION I: CONTAINERS</u>		
L(1)	Notify Illinois EPA of intent to close the container storage area.	180 days prior to commencement of closure.
L(1)	Submit sampling and analysis plan for review.	180 days prior to commencement of closure.
L(4)	Submit application for modification of permit and post-closure care plan.	No later than 30 days after determination that the container storage area cannot be clean closed.
L(6)	Update financial assurance to include modification in Conditions I(L)(4) or I(L)(5)	30 days after permit is modified.
L(7)	Submit certification for closure of container storage area.	No later than 60 days after closure of the storage area is complete.
<u>SECTION II: TANK SYSTEMS</u>		
F(2)(b)	Submit leak test for tanks and ancillary equipment.	Annually
F(2)(e)	Results of tank integrity assessment.	60 days after inspection.
G(1)	Notify Illinois EPA of a leak or spill.	24 hours after leak or spill occurs.
G(2)	Report to Illinois EPA on release and Permittee's response.	30 days after leak or spill occurs.

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J(1)	Notify Illinois EPA of intent to close tank system(s).	180 days prior to commencement of closure.
J(1)	Submit sampling and analysis plan.	180 days prior to commencement of closure.
J(6)	Submit application for permit modification and post-closure care plan.	60 days after determination that a tank system must be closed as a landfill.
J(7)	Financial Assurance for closure or post-closure.	30 days after effective date of permit or modification of permit.
J(8)	Submit certification of closure of tank system(s).	60 days after closure of tank system(s) is complete

SECTION III: STANDARD CONDITIONS

6	Complete application for new permit.	180 days prior to permit expiration.
11	Information requested by Illinois EPA and copies of records required to be kept by this permit.	Submittal date to be determined by Illinois EPA.
14	Notify Illinois EPA of planned physical alterations or additions.	15 days prior to planned change.
15	Notify Illinois EPA of changes that may result in permit noncompliance.	Within 15 days of change.
16	Application for permit modification indicating permit is to be transferred.	At least 90 days prior to transfer date.
18	Submission of any information required in a compliance schedule.	14 days after each schedule date.

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19	Report to Illinois EPA any non-compliance which may endanger health or environment.	
	By telephone	24 hours after discovery.
	In writing	5 days after discovery.
20	Report all other instances of non-compliance.	March 1 of each year along with Annual Report.
28	Notify Illinois EPA in writing of expected receipt of hazardous waste from foreign source.	4 weeks prior to receipt of waste.
40	Update arrangements with local authorities.	At least annually
41	Implementation of Contingency Plan	
	Notify appropriate state and local Agencies with designated response roles.	As needed
	Notify appropriate local officials	Immediately, if emergency coordinator's assessment indicates evacuation of local area is advisable
	Notify the Illinois EPA (217/782-3637) or Illinois ESDA (217/782-7860) if emergency coordinator determines there has been a release, fire or explosion, which could threaten human health or the environment, outside the facility	Immediately after determination made
	Notify Illinois EPA and appropriate state and local authorities, in writing that facility is in compliance with 35 Ill. Admin Code 724.156(h)	Prior to resuming operation in affected areas

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	Report to Illinois EPA details regarding incident, which required implementation of contingency plan.	15 days after event
47	Submit annual report required by 35 Ill. Admin Code 724.175.	March 1 of each year.
49	Application for permit modification amending closure plan for modification.	Within 90 days of discovery of need
50	Notify Illinois EPA that expecting to close.	180 days prior to beginning closure
54(a)	Adjust closure cost estimate for inflation.	30 days after anniversary date
54(b)	Revision of closure cost estimate	As needed, within 90 days of discovery of revision
55	Change in financial assurance mechanism for closure.	As needed
56	Change in coverage for sudden and non-sudden accidental occurrences	As needed
57	Notify Illinois EPA of commencement of voluntary or involuntary bankruptcy proceedings	10 days after commencement of proceeding

SECTION IV: CORRECTIVE ACTION

D(1)	The Permittee shall notify the Illinois EPA in Writing of any newly identified SWMU(s) Discovered during the course of groundwater Monitoring, field investigations, environment Audits or other means.	Within 60 days after discovery.
E	Future releases from SWMUs.	Within 60 days after its discovery.

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F(4)	Financial assurance requirements must also be met for any investigative or corrective action efforts in accordance with Subsections (D) and (E) above. Appropriate documentation of Financial Assurance in at least the amount of approved cost estimate must be submitted.	Within 60 days after cost estimate approved.
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SECTION VI: ADDITIONAL SPECIAL CONDITION

7(c)	Conduct meeting with local emergency response teams to review the contingency plan	Annually
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ATTACHMENT E

1(a)	Revise financial assurance	By the effective date of permit
2.	Revise liability coverage	By the effective date of permit

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SECTION VI
ADDITIONAL SPECIAL CONDITIONS

1. Waste Analysis

- A. The Permittee is prohibited from accepting wastes which contain dioxins detected above .001 mg/kg.
- B. The Permittee is prohibited from accepting waste waters for treatment at this facility which cannot be treated to meet the discharge requirements of the Metropolitan Water Reclamation District of Greater Chicago. Treatment as defined in 35 IAC 721.110 shall be conducted, however, dilution does not meet the definition of treatment for this special condition and is specifically prohibited from being used to satisfy the requirements of this special condition.
- C. F020, F021, F023, F026, F027 and F028 wastes which are hazardous as a result of 35 IAC 721.103(a)(2)(D) may be accepted at this facility provided they meet the following requirements:
 - 1. The acceptance of this waste does not violate special condition VI(1)(A) or VI(1)(B) below, and
 - 2. The waste is a waste water that can be:
 - a) Treated on site to meet the requirements of this permit, or
 - b) The waste is accepted on a transfer basis only provided the Permittee complies with the following requirements:
 - i. 90 days prior to the date the facility wishes to receive its first shipment of waste the facility notifies the Agency in writing. The notification must include the following information:
 - A. characteristics of the waste
 - B. estimated volume
 - C. name, address, and phone number of all off-site facilities which have agreed to accept the waste for further treatment or disposal

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- ii. Prior to receipt of the waste the Permittee receives written permission from the Agency's DLPC Permit Section to receive the waste.
 - iii. The Permittee complies with the Agency's manifest requirements.
- D. The Permittee shall not accept the following wastes for storage, recycle or treatment in the RCRA units:
- 1. garbage and refuse,
 - 2. infectious waste,
 - 3. radioactive or mixed waste,
 - 4. explosive waste,
 - 5. gas or compressed liquid cylinders without a Material Safety Data Sheet.
- E. Before any wastes are placed into a storage unit, facility management will assess the compatibility of each wastestream with the storage unit materials of construction and with wastestreams already stored therein.
- a. Containerized Storage Compatibility will be assessed by performing a Liquid Waste Compatibility Test, on the waste received for container storage (excluding lab packs) with a composite sample of wastestreams stored within the candidate storage area. At the beginning of each month, a new composite sample for each trailer will be developed for wastestreams held in storage. If the incoming sample passes the Liquid Waste Compatibility criteria, an aliquot of the incoming sample will be added to the composite to create a compatibility composite for the next sample. If the incoming waste sample fails the Liquid Waste Compatibility criteria, AETS may either prepare a new composite of wastestreams held in the trailer at the time of testing or place the waste in a trailer where compatibility is not at issue.
 - b. Tank Farm Compatibility will be assessed by performing a Liquid Waste Compatibility Test, on the liquid received for bulk storage with a composite sample of the tanks within the containment system to which the new waste will be added.

Ignitable wastes will be handled according to 35 Ill. Adm. Code 724.117 to prevent accidental ignition.

The compatibility test, Liquid Waste Compatibility Test D5058A, as modified below is described in the following publication "Annual Book of ASTM Standards," American Society for Testing Materials, 1916 Race Street, Philadelphia, Pennsylvania 19013.

Under the revised method the test will be conducted at 1:1 ratio of the new waste stream and the composite of existing wastes stored at the facility. Permittee will use a 100 ml composite of existing waste streams from which a 5 ml is taken to test 5 ml of a sample of the waste stream received for storage at the facility. If no reaction is observed, a second 5 ml aliquot of the same sample is added to the larger (remaining 95 ml) composite in preparation for testing the next sample.

- F. The Permittee is authorized to accept hazardous wastes identified in Attachment A provided the generator complies with the following requirements:
 - 1. The waste is analyzed in accordance with the waste analysis plan (WAP) submitted as part of the approved Part B permit application, and all subsequent waste analysis requirements included in the approved Part B Permit; and it is determined that the waste complies with the acceptance criteria in the approved waste analysis plan;
 - 2. The waste is delivered by an Illinois licensed special waste hauler or an exempt hauler as defined in 35 Ill. Admin. Code 809.211; and
 - 3. The waste is accompanied by a manifest, if required.
- G. The Permittee is authorized to accept non-hazardous waste provided a hazardous waste determination has been performed in accordance with 35 Ill. Admin. Code 722.111 and the Waste Receipt Procedures in Section C.2.5.4 in the WAP are followed.
- H. The Permittee shall conduct the following gate receipt analysis for waste received for storage except for labeled containers in lab packs:
 - 1. compatibility/reactivity review
 - 2. pH (for liquids only)
 - 3. physical appearance
- I. The Permittee shall conduct the following analysis for waste received in labeled containers in lab packs including commingled wastes are subject to the following requirements:
 - a. Compatibility review in accordance with the procedures identified in USEPA document EPA-600/2-80-076.

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- b. "Trained personnel (i.e., chemists, Certified Hazardous Materials Managers, etc.) shall review the contents of lab packs to verify the hazardous constituents present and appropriate U.S. EPA hazardous waste class. In the event the Permittee is unfamiliar with a compound in a lab pack, and the Permittee does not have an MSDS (either hard copy or electronic), the Permittee shall obtain an MSDS for the compound from the generator prior to placing the compound in a permitted unit or reject the lab pack containing the compound."
- J. The Permittee(s) shall document the receipt of each load of waste at that site in the operating record. The results of any analyses and any supplemental analyses performed on any received waste shall also be placed in the operating record.
 - 1. If manifest discrepancies are encountered, the procedures used to reconcile the discrepancy shall be included in the operating record;
 - 2. If a manifest discrepancy is not resolved within (15) days after receiving the waste, the Permittee(s) must immediately submit a letter to the Agency's Bureau of Land, describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper at issue.
- K. The facility shall conduct pre-acceptance profile in accordance with the approved waste analysis plan and the following requirements:
 - 1. The waste will be reevaluated for acceptance criteria when the generator notifies or the company has reason to believe, that the process or operation generating the hazardous waste has changed.
 - 2. For hazardous waste, the waste must be categorized as a hazardous waste for each TCLP parameter either:
 - a. identified through the profile process;
 - b. or if the waste is analyzed for the parameter in question according to the methods set forth in "Test Methods for Evaluating Solid Waste Physical/Chemical Methods." U.S. EPA Publication SW-846 and the constituent is present above the regulatory limit (for liquid) or presumed to be above the regulatory limit because the total concentration is greater than or equal to twenty times the regulatory limit (for solids).
- L. Conforming Lab Pak: A lab pack with all the material identified and the material corresponds with the packing list. Conforming lab packs can be accepted.

Non-conforming Lab Pack: A lab pack where insufficient information is available to determine acceptability of the lab pack or the lab pack contains unacceptable material. The following discrepancies shall cause a lab pack to be non-conforming:

- a. One or more broken bottles where the contents cannot be determined;
- b. Non-containerized, unidentifiable material;
- c. Missing label and container does not match anything on the packing list;
- d. Unacceptable material in lab pack;
- e. Packing list is not available;
- f. Unknown contents in lab pack.

The permittee shall reject unacceptable waste. Unidentified wastes are subject to the testing requirements identified in Condition F(1) in Section VI. Non-conforming shipments shall be documented in the facility's operating record. In addition, within 15 days, the permittee shall submit a report to the Illinois EPA identifying the non-conforming items, what steps were taken to resolve the non-conformance and what new procedures/steps have been implemented to ensure the incident does not recur.

- M. For waste streams subject to pre-acceptance, 10 percent shall be analyzed to verify the pre-acceptance parameters in Table C-4 of the approved WAP in the renewal permit application (Log No. B115R). Multiple shipments of the same waste in a calendar year is considered one waste stream unless Condition VI.K.1 applies.

2. Reporting Requirements

- A. Any incident which requires implementation of the contingency plan shall be recorded in the facility's operating record in an incident log which is maintained separate from the facilities other operating records. The incident log must include a copy of each incident report. In addition to the information identified in the approved application, the incident report must include the waste management units involved in the incident, the cause of the release, measures taken to correct the situation and prevent a reoccurrence.
- B. The Permittee shall notify the Agency's FOS office within 24 hours of implementation of the contingency plan that an incident has occurred and follow-up with a written report within 15 days, which includes the information identified in Condition F(3)(A). In the event the

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Agency's FOS office is closed, the following telephone numbers may be used to contact the Agency: 800/782-7860 or 217/782-3637.

3. Closure

At least 180 days prior to closure of any hazardous waste management unit at this facility the Permittee shall submit modification to the closure plan to ensure it complies with the current Agency standards in effect at the time of closure.

4. General Operating Requirements

- A. The Permittee is prohibited from conducting any waste management activities outside the permitted boundaries of this facility without a permit modification and proof of compliance with Section 39.2 of the Act. Waste management includes all storage, staging, treatment, disposal, transfer, sampling or activities not normally associated with the transportation of waste between facilities.
- B. Immediately upon arrival at this facility, the arrival time of each shipment of waste must be recorded in the operating record.
- C. Bulk trucks and containers of hazardous waste must be unloaded or rejected and shipped off site within 48 hours.
- D. On-site storage of bulk trucks, trailers containing hazardous waste in containers or rail cars of hazardous waste is prohibited. Storage does not include unloading operations conducted in accordance with (5)(B) and (C) above.
- E. The Permittee is prohibited from operating the hazardous waste management units identified in this permit without the appropriate operating permits from the Divisions of Water Pollution, Air Pollution Control and Public Water Supplies.

5. Construction Requirements

The proposed hazardous waste management units must be constructed in accordance with the approved permit application and the Part B permit. Modification to the tank system and tank or container storage secondary containment system including changes to physical dimensions or materials of construction are subject to the permit modification requirements prior to construction. Changes in structural members or foundation design which are completed prior to the operation of the hazardous waste management unit and have been certified by the Illinois licensed structural engineer of record are not subject to the permit modification requirements provided the changes are made solely to maintain the structural integrity of the unit.

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New units may only be constructed in accordance with the approved permit application, subject to the following modifications:

- a. Within thirty days after completing construction and prior to any container of waste being placed or stored in the container storage areas, the Permittee shall submit to the Agency a certification from a qualified, registered professional engineer, demonstrating that the container storage area meets the requirements of 35 IAC 724.275(b). This certification document shall contain the information required in Attachment G and a statement that the base is free of cracks or gaps.
- b. The Permittee may not store wastes in the new tanks until the construction certification is approved. The Agency shall review the certification described above to ensure the tank system and its secondary containment meets the requirements of 35 IAC 724.292 and 724.293. The Agency will respond with any comments to this certification in writing within forty-five days from the receipt of the certification. If the Agency does not respond within forty-five days from the receipt of this certification, the Permittee may consider the certification approved. The Agency review of this certification will be subject to permit appeal provisions contained in Section 39(a) and 40(a) of the Illinois Environmental Protection Act.

6. Contingency Plan

- A. The Permittee shall implement the contingency plan contained in the approved permit application any time there is (1) a release of hazardous waste or (2) a fire or explosion which involves hazardous waste or which occurs in areas where hazardous waste is treated or stored.
- B. In the event the contingency plan is implemented the following emergency response entities must be immediately notified:
 1. The entities which must be notified included:
 - a. Alsip Police Department
 - b. Alsip Fire Department
 - c. St. Francis Hospital Center
 - d. Cook County ESDA Coordinator
 2. The information which must be initially relayed to each entity includes:

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2. The information which must be initially relayed to each entity includes:
 - a. The type of emergency (release, fire or explosion);
 - b. The type of wastes involved in the emergency and the approximate quantity involved;
 - c. An initial assessment of the conditions at the site.
3. The entities identified in Condition VI(7)(B)(1) above must be immediately notified, as necessary, if it is determined that they are needed to properly respond to the emergency.
4. If the Permittee is able to properly respond to the emergency without any aid from the entities in accordance with Condition VI(7)(B)(1) above, the Permittee shall notify each of these entities that the emergency situation no longer exists once all required emergency response and clean-up activities have been completed.
- C. The Permittee shall review all components of the contingency plan with the local emergency response entities at least once every twelve months. Copies of the meeting notes and list of attendees shall be placed in the facility's operating record and be available to the Agency for review upon verbal or written request.
- D. Prior to accepting waste the Permittee shall make arrangements with the qualified environmental contractor to provide emergency response services in accordance with the approved contingency plan. The name, address, phone number and responsibilities of the emergency contractor shall be attached to all the Permittee's copies of the contingency plan. The agreement between the emergency response contractor and the Permittee shall be included in the facilities operating record. The contractor shall be notified in accordance with the procedures in Condition VI.7.B.

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ATTACHMENT A

**WASTES WHICH CAN BE ACCEPTED
AND
HAZARDOUS WASTE IDENTIFICATION NUMBER**

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ATTACHMENT A

Wastes Which May be Accepted at AETS

Industry and EPA Waste No.	Hazardous Waste Code
D001 Ignitability	(I)
D002 Corrosivity	(C)
D003 Reactivity	(R)
D004 Arsenic	(E)
D005 Barium	(E)
D006 Cadmium	(E)
D007 Chromium	(E)
D008 Lead	(E)
D009 Mercury	(E)
D010 Selenium	(E)
D011 Silver	(E)
D012 Endrin (1,2,3,4,10,10-hexachloro-1,7 epoxy-1,4,4a,5,6,7,8,8a-0 ctahydro-1,4 endo,endo-5, 8-dimeth-ano-naphthalene)	(E)
D013 Lindane (1,2,3,4,5,6, hexa-chloro0 cyclohexane, gamma isomer	(E)
D014 Methoxychlor (1,1,1-Trichloro- 2,2-bis [p-methoxyphenyl]ethane	(E)
D015 Toxaphene (C ₁₀ H ₁₀ C ₁₈ , technical chlorinated camphene, 67-69 percent chlorine)	(E)
D016 2,3-D (2,4 dichlorophenoxyacetic acid)	(E)
D017 2,24,5-TP Silvex (2,4,5-trichloro- phenoxypropionic acid	(E)
D018 Benzene	(E)
D019 Carbon Tetrachloride	(E)
D020 Chlordane	(E)
D021 Chlorobenzene	(E)
D022 Chloroform	(E)
D023 o-Cresol	(E)
D024 m-Cresol	(E)

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**Industry and EPA
Waste No.**

**Hazardous Waste
Code**

D025	p-Cresol	(E)
D026	Cresol	(E)
D027	1,4-Dichlorobenzene	(E)
D028	1,2-Dichloroethane	(E)
D029	1,1-Dichloroethylene	(E)
D030	2,4-Dinitrotoluene	(E)
D031	Heptachlor (and its hydroxides)	(E)
D032	Hexachlorobenzene	(E)
D033	Hexachlorobutadiene	(E)
D034	Hexachloroethane	(E)
D035	Methyl Ethyl Ketone	(E)
D036	Nitrobenzene	(E)
D037	Pentachlorophenol	(E)
D038	Pyridine	(E)
D039	Tetrachloroethylene	(E)
D040	Trichloroethylene	(E)
D041	2,4,5-Trichlorophenol	(E)
D042	2,4,6-Trichlorophenol	(E)
D043	Vinyl Chloride	(E)

Hazardous Wastes from Non-specific Sources:

F001	The following spent halogenated solvents used in degreasing: Tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride, and chlorinated fluorocarbons; all spent solvent mixtures/blends used in degreasing containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F002, F004 and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.	(T)
F002	The following spent halogenated solvents: Tetrachloroethylene, methylene chloride,	(T)

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Hazardous Waste
 Code

trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, ortho-dichlorobenzene, trichlorofluoromethane, and 1,1,2-trichloroethane; and all spent solvent mixtures/blends containing, before use, a total of one or more of the above halogenated solvents or those listed in F001, F004, or F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.

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|------|---|-------|
| F003 | The following spent non-halogenated solvents:
Xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol; all spent solvent mixtures/blends containing, before use, only the above non-halogenated solvents; and all spent solvent mixtures/blends containing, before use, one or more of the above non-halogenated solvents, and, a total of ten percent or more (by volume) of one or more of those solvents listed in F001, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures. | (I) |
| F004 | The following spent non-halogenated solvents:
Cresols and cresylic acid, nitrobenzene; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures. | (T) |
| F005 | The following spent non-halogenated solvents:
Toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine; benzene, 2-ethoxyethanol, and 2-nitropropane; all spent solvent mixtures/blends containing, before use, a total of ten | (I,T) |

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percent (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, or F004; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.

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|------|--|-------|
| F006 | Wastewater treatment sludges from electroplating operations except from the following processes: (1) sulfuric acid anodizing of aluminum; (2) tin plating on carbon steel; (3) zinc plating (segregated basis) on carbon steel; (4) aluminum or zinc-aluminum plating on carbon steel; (5) cleaning/stripping associated with tin, zinc, and aluminum plating on carbon steel; and (6) chemical etching and milling of aluminum. | (T) |
| F007 | Spent cyanide plating bath solutions from electroplating operations. | (R,T) |
| F008 | Plating bath residues from the bottom of plating baths from electroplating operations where cyanides are used in the process. | (R,T) |
| F009 | Spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process. | (R,T) |
| F010 | Quenching bath residues from oil baths from metal heat treating operations where cyanides are used in the process. | (R,T) |
| F011 | Spent cyanide solutions from salt bath pot cleaning from metal heat treating operations. | (R,T) |
| F012 | Quenching wastewater treatment sludges from metal heat treating operations where cyanides are used in the process. | (T) |

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**Industry and EPA
Waste No.**

**Hazardous Waste
Code**

F019 Wastewater treatment sludges from the chemical conversion coating of aluminum.

(T)

F020 Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the production or manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of tri-ortetrachlorophenol, or of intermediates used to produce their pesticide derivates. (This listing does not include wastes from the production of Hexachlorophene from highly purified (2,4,5-trichlorophenol).

(H)

F021 Wastes (except wastewater and spent carbon from hydrogen chloride purification from the production or manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of pentachlorophenol, or of intermediates used to produce its derivatives.

(H)

F022 Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of tetra-, penta-, or hexachlorobenzenes under alkaline conditions.

(H)

F023 Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the production of materials on equipment previously used for the production or manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of tri- and tetrachlorophenols. (This listing does not include wastes from equipment used only for the production or use of Hexachlorophene from highly purified 2,3,5-trichlorophenol).

(H)

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**Hazardous Waste
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F024 Wastes, including but not limited to distillation residues, heavy ends, tars, and reactor clean-out wastes from the production of chlorinated aliphatic hydrocarbons, having carbon content from one to five, utilizing free radical catalyzed processes. (This listing does not include light ends, spent filters and filter aids, spent desiccants, wastewater, wastewater treatment sludges, spent catalysts, and wastes listed in Sec. 261.32).

F025 Condensed light ends, spent filters and filter aids, and spent desiccant wastes from the production of certain chlorinated aliphatic hydrocarbons, by free radical catalyzed processes. These chlorinated aliphatic hydrocarbons are those having carbon chain lengths ranging from one to and including five, with varying amounts and positions of chlorine substitution.

F026 Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the production of materials on equipment previously used for the manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of tetra-, penta-, or hexachlorobenzene under alkaline conditions.

(H)

F027 Discarded unused formulations containing tri-, tetra-, or pentachlorophenol or discarded unused formulations containing compounds derived from these chlorophenols. (This listing does not include formulations containing Hexachlorophene synthesized from prepurified 2,4,5-trichlorophenol as the sole component.)

(H)

F028 Residues resulting from the incineration or thermal treatment of soil contaminated with EPA Hazardous Waste Nos. F020, F021, F022, F026 and F027.

(T)

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**Industry and EPA
Waste No.**

**Hazardous Waste
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- F032 Wastewater, process residuals, preservative drippage and discarded spent formulations from wood preserving processes at facilities that use or previously used chlorophenolic formulations.
- F033 Wastewater, process residuals, protective drippage and discarded spent formulations from wood surface protection processes at facilities that use or previously used chlorophenolic formulations.
- F034 Wastewater, process residuals, preservative drippage and discarded spent formulations from wood preserving processes at facilities that use or previously used creosotes.
- F035 Wastewater, process residuals, preservative drippage and discarded spent formulations from wood preserving processes at facilities that currently use inorganic preservatives containing arsenic or chloroform.
- F037 Petroleum refinery primary oil/water/solids separation sludge.
- F038 Petroleum refinery secondary (emulsified) oil/water/solids separation sludge.
- F039 Leachate resulting from the treatment, storage or disposal of wastes classified by more than one waste code under Subpart D, or a mixture of wastes classified under Subpart C and D except for F020 through F023 and F026 through F038, which retain their original listing.

Hazardous Wastes from Specific Sources:

- K001 Bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol.

(T)

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Industry and EPA Waste No.	Hazardous Waste Code
K002 Wastewater treatment sludge from the production of chrome yellow and orange pigment.	(T)
K003 Wastewater treatment sludge from the production of molybdate orange pigments.	(T)
K004 Wastewater treatment sludge from the production of zinc yellow pigments.	(T)
K005 Wastewater treatment sludge from the production of chrome green pigments.	(T)
K006 Wastewater treatment sludge from the production of chrome oxide green pigments.	(T)
K007 Wastewater treatment sludge from the production of iron blue pigments.	(T)
K008 Oven residue from the production of chrome oxide green pigments.	(T)
K009 Distillation bottoms from the production of acetaldehyde from ethylene.	(T)
K010 Distillation side cuts from the production of acetaldehyde from ethylene.	(T)
K011 Bottom stream from the wastewater stripper in the production of acrylonitrile.	(R,T)
K013 Bottom stream from the acetonitrile.	(R,T)
K014 Bottoms from the acetonitrile purification column in the production of acrylonitrile.	(T)
K015 Still bottoms from the distillation of benzyl chloride.	(T)

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Industry and EPA Waste No.	Hazardous Waste Code
K016 Heavy ends or distillation residues from the production or carbon tetrachloride.	(T)
K017 Heavy ends (still bottoms) from the purification column in the production of epichlorohydrin.	(T)
K018 Heavy ends from the fractionation column in ethyl chloride production.	(T)
K019 Heavy ends of the distillation of ethylene dichloride in ethylene dichloride production.	(T)
K020 Heavy ends from the distillation of vinyl chloride in vinyl chloride monomer production.	(T)
K021 Aqueous spent antimony catalyst waste from fluoromethanes production.	(T)
K022 Distillation bottom tars from the production of phenol/acetone from cumene.	(T)
K023 Distillation light ends from the production of phthalic anhydride from naphthalene.	(T)
K024 Distillation bottoms from the production of phthalic anhydride from naphthalene.	(T)
K025 Distillation bottoms from the production of phthalic anhydride from naphthalene.	(T)
K026 Stripping still tails from the production of methy ethyl pyridines.	(T)
K027 Centrifuge and distillation residues from toluene diisocyanate production.	(R,T)

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Industry and EPA Waste No.	Hazardous Waste Code
K028 Spent catalyst from the hydrochlorinator reactor in the production of 1,1,1-trichloroethane.	(T)
K029 Waste from the product steam stripper in the production of 1,1,1-trichloroethane.	(T)
K030 Column bottoms or heavy ends from the combined production of trichloroethylene and perchloroethylene.	(T)
K031 By-product salts generated in the production of MSMA and cacodylic acid.	(T)
K032 Wastewater treatment sludge from the production of chlordane.	(T)
K033 Wastewater and scrub water from the chlorination of cyclopentadiene in the production of chlordane.	(T)
K034 Filter solids from the filtration of hexachlorocyclopentadiene in the production of chlordane.	(T)
K035 Wastewater treatment sludges generated in the production of creosote.	(T)
K036 Still bottoms from toluene reclamation distillation in the production of disulfoton.	(T)
K037 Wastewater treatment sludges from the production of disulfoton.	(T)
K038 Wastewater from the washing and stripping of phorate production.	(T)

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<u>Industry and EPA Waste No.</u>	<u>Hazardous Waste Code</u>
K039 Filter cake from the filtration of diethyl-phosphorodithioic acid in the production of phorate.	(T)
K040 Wastewater treatment sludge from the production of phorate.	(T)
K041 Wastewater treatment sludge from the production of toxaphene.	(T)
K042 Heavy ends or distillation residues from the distillation of tetrachlorobenzene in the production of 2,4,5-T.	(T)
K043 2,6-Dichlorophenol waste from the production of 2,4-D.	(T)
K044 Wastewater treatment sludges from the manufacturing and processing of explosives.	(R)
K045 Spent carbon from the treatment of wastewater containing explosives.	(R)
K046 Wastewater treatment sludges from the manufacturing, formulation, loading of lead-based initiating compounds.	(T)
K047 Pink/red water from TNT operations.	(R)
K048 Dissolved air flotation (DAF) float from the petroleum refining industry.	(T)
K049 Slop oil emulsion solids from petroleum refining industry.	(T)
K050 Heat exchanger bundle cleaning sludge from the petroleum refining industry.	(T)

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Industry and EPA Waste No.	Hazardous Waste Code
K051 API separator sludge from the petroleum refining industry.	(T)
K052 Tank bottoms (leaded) from the petroleum refining industry.	(T)
K060 Ammonia still lime sludge from coking operations.	(T)
K061 Emission control dust/sludge from the primary production of steel in electric furnaces.	(T)
K062 Spent pickle liquor generated by steel finishing operations of facilities within the iron and steel industry (SIC 331 and 332).	(C,T)
K069 Emission control dust/sludge from secondary lead smelting.	
K071 Brine purification muds from the mercury cell process in chlorine production, where separately prepurified brine is not used.	(T)
K073 Chlorinated hydrocarbon waste from the purification step of the diaphragm cell process using graphite anodes in chlorine production.	(T)
K083 Distillation bottoms from aniline production.	(T)
K084 Wastewater treatment sludges generated during the production of veterinary pharmaceuticals from arsenic or organo-arsenic compounds.	(T)
K085 Distillation or fractionation column bottoms from the production of chlorobenzenes.	(T)
K086 Solvent washes and sludges, caustic washes and sludges, or water washes and sludges from cleaning	(T)

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Industry and EPA Waste No.	Hazardous Waste Code
tubs and equipment used in the formulation of ink from pigments, driers, soaps, and stabilizers containing chromium and lead.	
K087 Decanter tank tar sludge from coking operations.	(T)
K093 Distillation light ends from the production of phthalic anhydride from ortho-xylene.	(T)
K094 Distillation bottoms from the production of phthalic anhydride from ortho-xylene.	(T)
K095 Distillation bottoms from the production of 1,1,1-trichloroethane.	(T)
K096 Heavy ends from the heavy ends column from the production of 1,1,1-trichloroethane.	(T)
K097 Vacuum stripper discharge from the chlordane chlorinator in the production of chlordane.	(T)
K098 Untreated process wastewater from the production of toxaphene.	(T)
K099 Untreated waste from the production of 2,4-D.	(T)
K100 Waste leaching solution from acid leaching of emission control dust/sludge from secondary lead smelting.	(T)
K101 Distillation tar residues from the distillation of aniline-based compounds in the production of veterinary pharmaceuticals from arsenic or organo-arsenic compounds.	(T)
K102 Residue from the use of activated carbon for decolorization in the production of veterinary pharmaceuticals from arsenic compounds.	(T)

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<u>Industry and EPA Waste No.</u>	<u>Hazardous Waste Code</u>
K103 Process residues from aniline extraction from the production of aniline.	(T)
K104 Combined wastewater streams generated from nitrobenzene/aniline production.	(T)
K105 Separated aqueous stream from the reactor product washing step in the production of chlorobenzenes.	(T)
K106 Wastewater treatment sludge from the mercury cell process in chlorine production.	(T)
K111 Product washwaters from the production of dinitrotoluene via nitration of toluene.	(C,T)
K112 Reaction by-product water from the drying column in the production of toluenediamine via hydrogenation of dinitrotoluene.	(T)
K113 Condensed liquid light ends from the purification of toluenediamine in the production of toluenediamine via hydrogenation dinitrotoluene.	(T)
K114 Vicinals from the purification of toluenediamine in the production of toluenediamine via hydrogenation of dinitrotoluene.	(T)
K115 Heavy ends from the purification of toluenediamine in the production of toluenediamine via hydrogenation of dinitrotoluene.	(T)
K116 Organic condensate from the solvent recovery column in the production of toluene diisocyanate via phosgenation of toluenediamine.	(T)

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Industry and EPA Waste No.	Hazardous Waste Code
K117 Wastewater from the reactor vent gas scrubber in the production of ethylene dibromide via bromination of ethene.	(T)
K118 Spent absorbent solids from purification of ethylene dibromide in the production of ethylene dibromide via bromination of ethene.	(T)
K123 Process wastewater (including supernates, filtrates, and wash waters) from the production of ethylenebisdithiocarbamic acid and its salts.	(T)
K124 Reactor vent scrubber water from the production of ethylene-bisdithiobarbamic acid and its salts.	(T,C)
K125 Filtration, evaporation, and centrifugation of solids from the production of ethylenebisdithio carbonic acid and its salts.	(T,C)
K126 Baghouse dust and floor sweepings in milling and packaging operations from production or formulation of ethylenebisdithiocarbamic acid and its salts.	(T)
K136 Still bottoms from the purification of ethylene dibromide in the production of ethylene dibromide via bromination of ethene.	(T)
K169 Crude oil storage tank sediment from petroleum Refining operations.	(T)
K170 Clarified slurry oil tank sediment or in-line filter/separation Solids from petroleum refining operations.	(T)
K171 Spent hydrotreating catalyst from petroleum refining operations, including guard beds used to desulfurize feeds to other catalytic reactors (this listing does not include support media).	(I,T)

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Industry and EPA
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K172 Spent hydrotreating catalyst from petroleum refining (I,T)
 operations, including guard beds used to desulfurize feeds to
 other catalytic reactors (this listing does not include support media).

Discarded Commercial Chemical Products, Off-Specification
 Species, Container Residues, and Spill Residues Thereof:

P001	Warfarin, when present at concentrations greater than 0.3%.	(H)
P002	1-Acetyl-2-thiourea	(H)
P003	Acrolein	(H)
P004	Aldrin	(H)
P005	Allyl alcohol	(H)
P006	Aluminum phosphide	(R,T)
P007	5-(Aminomethyl)-3-isoxazolol	(H)
P008	4-Aminopyridine	(H)
P009	Ammonium picrate	(R)
P010	Arsenic acid	(T)
P011	Arsenic pentoxide	(T)
P012	Arsenic trioxide	(T)
P013	Barium cyanide	(H)
P014	Benzenethiol	(T)
P015	Beryllium dust	(H)
P016	Bis(9chloromethyl) ether	(H)
P017	Bromoacetone	(T)
P018	Brucine	(H)
P020	Dinoseb	(H)
P021	Calcium cyanide	(H)
P022	Carbon bisulfide	(T)
P023	Chloroacetaldehyde	(H)
P024	p-Chloroaniline	(H)
P026	1-(o-Chlorophenyl)thiourea	(H)
P027	3-Chloropropionitrile	(H)
P028	Benzyl chloride	(H)
P029	Copper cyanides	(H)
P030	Cyanides (soluble cyanide salts) not elsewhere specified.	(T)

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Industry and EPA Waste No.	Hazardous Waste Code
P031 Cyanogen	(H)
P033 Cyanaogen chloride	(H)
P034 4,6-Dinitro-o-cyclohexylphenol	(T)
P036 Dichlorophenylarsine	(H)
P037 Dieldrin	(H)
P038 Diethylarsine	(T)
P039 Disulfoton	(T)
P040 O,O-Diethyl O-pyrazinyl phosphoro-thioate	(H)
P041 Diethyl-p-nitrophenyl phosphate	(H)
P042 Epinephrine	(H)
P043 Diisopropyl fluorophosphate	(H)
P044 Dimethoate	(T)
P045 Thiofanox	(H)
P046 Ethanamine, 1,10dimethyl-2-phenyl-	(T)
P047 4,6-Dinitro-o-cresol and salts	(H)
P048 2,4-Dinitrophenol	(H)
P049 2,4-Dithiobiuret	(H)
P050 Endosulfan	(H)
P051 Endrin	(H)
P054 Ethylenimine	(H)
P056 Fluorine	(H)
P057 Fluoroacetamide	(H)
P058 Fluoroacetic acid, sodium salt	(H)
P059 Heptachlor	(H)
P060 Hexachlorohexahydro-endo, endo-dimethanonaphthalene	(H)
P062 Hexaethyl tetraphosphate	(H)
P063 Hydrogen cyanide	(H)
P064 Methyl isocyanate	(H)
P065 Mercury fulminate	(R,T)
P066 Methomyl	(H)
P067 2-Methylaziridine	(H)
P068 Methyl hydrazine	(H)
P069 2-Methylactonitrile	(H)
P070 Aldicarb	(H)
P071 Methyl parathion	(H)
P072 alpha-Naphthylthiourea	(H)
P073 Nickel carbonyl	(H)

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P074	Nickel cyanide	(H)
P075	Nicotine and salts	(T)
P076	Nitric oxide	(T)
P077	p-Nitroaniline	(T)
P078	Nitrogen dioxide	(H)
P081	Nitroglycerine	(R,T)
P082	N-Nitrosodimethylamine	(H)
P084	N-Nitrosomethylvinylamine	(H)
P085	Octamethylpyrophosphoramide	(H)
P087	Osmium oxide	(H)
P088	Endothall	(H)
P089	Parathion	(T)
P092	Phenylmercuric acetate	(H)
P093	N-Phenylthiourea	(H)
P094	Phorate	(T)
P095	Phosgene	(T)
P096	Phosphine	(H)
P097	Pamphur	(H)
P098	Potassium cyanide	(H)
P099	Potassium silver cyanide	(H)
P101	Propanenitrile	(H)
P102	Propargyl alcohol	(H)
P103	Selenourea	(H)
P104	Silver cyanide	(H)
P105	Sodium azide	(H)
P106	Sodium cyanide	(H)
P108	Strychnine and salts	(T)
P109	Tetraethyldithiopyrophosphate	(H)
P110	Tetraethyl lead	(H)
P111	Tetraethylpyrophosphate	(H)
P112	Tetranitromethane	(R)
P113	Thallic oxide	(H)
P114	Thallium(I) selenide	(H)
P115	Thallium(I) sulfate	(H)
P116	Thiosemicarbazide	(H)
P118	Trichloromethanethiol	(H)

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Industry and EPA Waste No.	Hazardous Waste Code
P119 Vanadic acid, ammonium salt	(H)
P120 Vanadium pentoxide	(H)
P121 Zinc cyanide	(H)
P122 Zinc phosphide	(R,T)
P123 Toxaphene	(H)
Commercial Chemical Products, Manufacturing Chemical Intermediates, or Off-Specification Commercial Chemical Products:	
U001 Acetaldehyde	(I)
U002 Acetone	(I)
U003 Acetonitrile	(I,T)
U004 Acetophenone	(T)
U005 2-Acetylaminofluorene	(T)
U006 Acetyl chloride	(C,R,T)
U007 Acrylamide	(T)
U008 Acrylic acid	(I)
U009 Acrylonitrile	(T)
U010 Mitomycin C	(T)
U011 Amitrole	(T)
U012 Aniline	(I,T)
U014 Auramine	(T)
U015 Azaserine	(T)
U016 Benz(c)acridine	(T)
U017 Benzal chloride	(T)
U018 Benz(a)anthracene	(T)
U019 Benzene	(I,T)
U020 Benzenesulfonyl chloride	(C,R)
U021 Benzidine	(T)
U022 Benzo(a)pyrene	(T)
U023 Benzotrichloride	(C,R,T)
U024 Bis(2-chloroethoxy) methane	(T)
U025 Dichloroethyl ether	(T)
U026 Chloronaphazine	(T)
U027 Bis(2-chloroisopropyl) ether	(T)
U028 Bis(2-ethylhexyl) phthalate	(T)
U029 Bethyl bromide	(T)
U030 Benzene, 1-bromo-4-phenoxy-	(T)

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Industry and EPA
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U031	N-Butyl alcohol	(I)
U032	Calcium chromate	(T)
U033	Carbonyl fluoride	(R,T)
U034	Chloral	(T)
U035	Chlorambucil	(T)
U036	Chlordane, technical	(T)
U037	Chlorobenzene	(T)
U038	Ethyl 4,4'-dichlorobenzilate	(T)
U039	4-Chloro-m-cresol	(T)
U041	1-Chloro-2,3-epoxypropane	(T)
U042	2-Chloroethyl vinyl ether	(T)
U043	Vinyl chloride	(T)
U044	Chloroform	(T)
U045	Methyl chloride	(I,T)
U046	Chloromethyl methyl ether	(T)
U047	beta-Chloronaphthalene	(T)
U048	o-Chlorophenol	(T)
U049	Benzenamine, 4-chloro-2-methyl-	(T)
U050	Chrysene	(T)
U051	Creosote	(T)
U052	Cresols	(T)
U053	Crotonaldehyde	(T)
U055	Cumene	(I)
U056	Cyclohexane	(I)
U057	Cyclohexanone	(I)
U058	Cyclophosphamide	(T)
U059	Daunomycin	(T)
U060	DDD	(T)
U061	DDT	(T)
U062	Diallate	(T)
U063	Dibenz[a,h]anthracene	(T)
U064	Dibenz[a,i]pyrene	(T)
U066	1,2-Dibromo-e-chloropropane	(T)
U067	Ethylene dibromide	(T)
U068	Methylene bromide	(T)
U069	Dibutyl phthalate	(T)

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Industry and EPA Waste No.	Hazardous Waste Code
U070 o-Dichlorobenzene	(T)
U071 m-Dichlorobenzene	(T)
U072 p-Dichlorobenzene	(T)
U073 3,3'-Dichlorobenzidine	(T)
U074 1,4-Dichloro-2-butene	(I,T)
U075 Dichlorodifluoromethane	(T)
U076 Ethylidene dichloride	(T)
U077 Ethylene dichloride	(T)
U078 1,1-Dichloroethylene	(T)
U079 1,2-Dichloroethylene	(T)
U080 Methylene chloride	(T)
U081 2,4-Dichlorophenol	(T)
U082 2,6-Dichlorophenol	(T)
U083 1,2-Dichloropropane	(T)
U084 1,3-Dichloropropane	(T)
U085 1,2,3,4-Diepoxybutane	(I,T)
U086 N,N-Diethylhydrazine	(T)
U087 o,o-Diethyl-S-methyl-dithiophosphate	(T)
U088 Diethyl phthalate	(T)
U089 Diethylstilbestrol	(T)
U090 Dihydrosafrole	(T)
U091 3,3'-Dimethoxybenzidine	(T)
U092 Dimethylamine	(T)
U093 Dimethylaminoazobenzene	(T)
U094 7,12-Dimethylbenz[a]anthracene	(T)
U095 3,3'-Dimethylbenzidine	(T)
U096 Alpha.alpha-Dimethylbenzylhydro-peroxide	(R)
U097 Dimethylcarbamoyl chloride	(T)
U098 1,1-Dimethylhydrazine	(T)
U099 1,2-Dimethylhydrazine	(T)
U101 2,4-Dimethylphenol	(T)
U102 Dimethyl phthalate	(T)
U103 Dimethyl sulfate	(T)
U105 2,4-Dinitrotoluene	(T)
U106 2,6-Dinitrotoluene	(T)
U107 Di-n-octyl phthalate	(T)
U108 1,4-Dioxane	(T)

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U109	1,2-Diphenylhydrazine	(T)
U110	Dipropylamine	(I)
U111	Di-N-propylnitrosamine	(T)
U112	Ethyl acetate	(I)
U113	Ethyl acrylate	(I)
U114	Ethylenebis(dithiocarbamic acid), salts and esters	(T)
U115	Ethylene oxide	(I,T)
U116	Ethylene thiourea	(T)
U117	Ethyl ether	(I)
U118	Ethyl methacrylate	(T)
U119	Ethyl methanesulfonate	(T)
U120	Fluoranthene	(T)
U121	Metane, trichlorofluoro-	(T)
U122	Formaldehyde	(T)
U123	Formic acid	(C,T)
U124	Furan	(I)
U125	Furfural	(I)
U126	Glycidylaldehyde	(T)
U127	Hexachlorobenzene	(T)
U128	Hexachlorobutadiene	(T)
U129	Lindane	(I)
U130	Hexachlorocyclopentadiene	(T)
U131	Hexachloroethane	(T)
U132	Hexachlorophene	(T)
U133	Hydrazine	(R,T)
U134	Hydrogen fluoride	(C,T)
U135	Hydrogen sulfide	(T)
U136	Cacodylic acid	(T)
U137	Indeno[1,2,3-cd]pyrene	(T)
U140	Isobutyl alcohol	(I,T)
U141	Isosafrole	(T)
U142	Kepone	(T)
U143	Lasiocarpine	(T)
U144	Lead acetate	(T)
U145	Lead phosphate	(T)
U146	Lead subacetate	(T)
U147	Maleic anhydride	(T)

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Industry and EPA Waste No.	Hazardous Waste Code
U148 Maleic hydrazide	(T)
U149 Malononitrile	(T)
U150 Melphalan	(T)
U151 Mercury	(T)
U152 Methacrylonitrile	(I,T)
U153 Methanethiol	(I,T)
U154 Methanol	(I)
U155 Methapyrilene(T)	(T)
U156 Methyl chlorocarbonate	(I,T)
U157 3-Methylchlolanthrene	(T)
U158 4,4'-Methylenebis(2-chloroaniline)	(T)
U159 Methyl ethyl ketone	(I,T)
U160 Methyl ethyl ketone peroxide	(R,T)
U161 Methyl isobutyl ketone	(I)
U162 Methyl methacrylate	(I,T)
U163 N-methyl-N'nitro-N-nitrosoquandine	(T)
U164 Methylthiouracil	(T)
U165 Napthalene	(T)
U166 1,4-Naphthalenedione	(T)
U167 1-Naphthylamine	(T)
U168 2-Naphthylamine	(T)
U169 Nitrobenzene	(I,T)
U170 p-Nitrophenol	(T)
U171 2-Nitropropane	(I,T)
U172 N-Nitrosodi-n-butylamine	(T)
U173 N-Nitrosodiethanolamine	(T)
U174 N-Nitrosodiethylamine	(T)
U176 N-Nitroso-N-ethylurea	(T)
U177 N-Nitroso-N-methylurea	(T)
U178 N-Nitroso-N-methylurethane	(T)
U179 N-Nitrosopiperidine	(T)
U180 Nitrosopyrrolidine	(T)
U181 5-Nitro-o-toluidine	(T)
U182 Paraldehyde	(T)
U183 Pentachlorobenzene	(T)
U184 Pentachloroethane	(T)
U185 Pentachloronitrobenzene	(T)

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Industry and EPA Waste No.	Hazardous Waste Code
U186 1,3-Pentadiene	(I)
U187 Phenacetin	(T)
U188 Phenol	(T)
U189 Phosphorous sulfide	(R)
U190 Phthalic anhydride	(T)
U191 Pyridine, 2-methyl-	(T)
U192 Pronamide	(T)
U193 1,3-Propane sultone	(T)
U194 1-Propanamine	(I,T)
U196 Pyridine	(T)
U197 p-Benzoquinon	(T)
U200 Reserpine	(T)
U201 Resorcinol	(T)
U202 Saccharin and salts	(T)
U203 Safrole	(T)
U204 Selenium dioxide	(T)
U205 Selenium disulfide	(R,T)
U206 Streptozotocin	(T)
U207 1,2,4,5-Tetrachlorobenzene	(T)
U208 1,1,1,2,-Tetrachloroethane	(T)
U209 1,1,2,2,-Tetrachloroethane	(T)
U210 Tetrachloroethylene	(T)
U211 Carbon tetrachloride	(T)
U213 Tetrahydrofuran	(T)
U214 Thallium(I) acetate	(T)
U215 Thallium(I) carbonate	(T)
U216 Thallium(I) chloride	(T)
U217 Thallium(I) nitrate	(T)
U218 Thioacetamide	(T)
U219 Thiourea	(T)
U220 Toluene	(T)
U221 Toluenediamine	(T)
U222 o-Toluidine hydrochloride	(T)
U223 Toluene hydrochloride	(R,T)
U225 Bromoform	(T)
U226 1,1,1-Trichloroethane	(T)
U227 1,1,2-Trichloroethane	(T)

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Industry and EPA Waste No.	Hazardous Waste Code
U228 Trichloroethene	(T)
U234 sym-Trinitrobenzene	(R,T)
U235 Tris(2,3-dibromopropyl) phosphate	(T)
U236 Trypan blue	(T)
U237 Uracil mustard	(T)
U238 Ethyl carbamate (urethan)	(T)
U239 Xylene	(I)
U240 2,3-D, salts and esters	(T)
U243 Hexachloropropene	(T)
U244 Thiuram	(T)
U246 Bromine cyanide	(T)
U247 Methoxychlor	(T)
U248 Warfarin, when present at concentrations of 0.3% or less	(T)
U249 Zinc phosphide, when present at concentrations of 10% or less	(T)
U328 o-Toluidine	(T)
U353 p-Toluidine	(T)
U359 Ethylene glycol monoethyl ether	(T)
K064 Acid plant blowdown slurry/sludge resulting from the thickening of blowdown slurry from primary copper production.	(T)
K065 Surface impoundment solids contained in and dredged from surface impoundments at primary lead smelting facilities.	(T)
K066 Sludge from treatment of process wastewater and/or acid plant blowdown from primary zinc production.	(T)
K088 Spent potliners from primary aluminum reduction.	(T)
K090 Emission control dust or sludge from ferrochromium-silicon production.	(T)

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Industry and EPA Waste No.	Hazardous Waste Code
K091 Emission control dust or sludge from ferrochromium production.	(T)
K107 Column bottoms from product separation from the production of 1,1-dimethylhydrazine (UDMH) from carboxylic acid hydrazines.	(C,T)
K108 Condensed column overheads from product separation and condensed reactor vent gases from the production of 1,1-dimethylhydrazine (UMDH) from carboxylic acid hydrazines.	(I,T)
K109 Spent filter cartridges from product purification from the production of 1,1-dimethylhydrazine (UMDH) from carboxylic acid hydrazines.	(T)
K110 Condensed column overheads from intermediate separation from the production of 1,1-dimethylhydrazine (UMDH) from carboxylic acid hydrazines.	(T)
K131 Wastewater from the reactor and spent sulfuric acid from the acid dryer from the production of methyl bromide.	(C,T)
K132 Spent absorbent and wastewater separator solids from the production of methyl bromide.	(T)
U232 2,4,5-Trichloro-phenoxyacetic acid.	(T)
U233 2-(2,4,5-Trichlorophenoxy) propionic acid.	(T)

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ATTACHMENT B

INSPECTION SCHEDULE

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ATTACHMENT B

GENERAL INSPECTION SCHEDULE AND SECURITY DEVICES

	<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>	<u>INSPECTION FREQUENCY</u>
Fences	Breaches, damage to chain link or barbed wire, corrosion	Weekly
Northwest Gate	Corrosion, damage to chain link or barbed wire, proper gate lock function	Weekly
Southwest Gate	Corrosion, damage to chain link or barbed wire, proper gate lock function	Weekly
Northeast Gate (Vehicle) and North Gate (Personnel)	Corrosion, damage to chain link or barbed wire, proper gate lock function	Weekly
Warning Signs	Presence of warning signs	Weekly
Lighting System	Lights for operability	Weekly
Protective Clothing (hard hats, goggles, impermeable fullbody coveralls, gloves, foot coverings, and face shields)	Adequate supply Deterioration, damage (e.g., cracks, tears, punctures, stiffness) Accessibility	Monthly
First Aid Equip- ment and Supplies	Adequate supply Deterioration, damage Operability of supplies Accessibility	Monthly

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	<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>	<u>INSPECTION FREQUENCY</u>
Respirators with Cartridges for organic vapors and acid gases	Adequate supply	Monthly
	Deterioration, damage (e.g., cracks, tears, punctures)	
	Operability	
	Accessibility	
Fire Extinguishers	Operability, need for recharge	Monthly
	Evidence of tampering	
	Accessibility	
Emergency Showers and Eyewash Stations	Water pressure	Monthly
	Leaks	
	Accessibility	
Emergency Pull- Box Stations	Evidence of tampering	Monthly
	Accessibility	
PA System	Operability	Monthly
	Accessibility	
Internal/External Phones	Operability	Monthly
	Accessibility	
Oil Absorbent	Adequate supply	Monthly

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	<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>	<u>INSPECTION FREQUENCY</u>
Submersible Pump	Operability	Monthly
	Clogs	
	Availability	
Flexible Hoses with Quick Couple Fittings	Cracks, holes	Monthly
	Fittings stick	
	Availability	
Empty 55-gallon Drums	Adequate Supply	Monthly
	Corrosion, damage	
	Accessibility	
	Tanker transfer areas	
	Waste oil processing equipment	
	Wastewater treatment equipment	
	Fuel blending process equipment	
	- dissolver process	
	- solids repackaging process	
	Associated support processes	
	- drum cleaning unit	
Container Storage Area	Evidence of spilled material	Daily*
	Liquid accumulation in containment area including sump**	Weekly

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<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>	<u>INSPECTION FREQUENCY</u>	
Prompt container removal from unloading portion of container storage area	Weekly	
Cracks and gaps in, or damage to, containment bases, sumps and drains, and coatings	Weekly	
Odors	Weekly	
Removal of spent absorbent materials and cleanup materials	Daily*	
Corrosion of grating over drains and sumps	Weekly	
Containers are not stacked more than two high	Daily*	
*As part of the normal operating procedures, this inspection will be conducted on a daily basis.		
**All sumps will be emptied within 24 hours after an inspection determines they contain liquids.		
Stored Containers in Container Storage Area	Drum leaks/corrosion, particularly around seams, bungs, covers	Weekly
	Damage to containers (e.g. large dents)	Weekly
	Drum swelling.	Weekly
	Containers are closed with bungs/ covers in place	Weekly

	<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>	<u>INSPECTION FREQUENCY</u>
	containers are properly marked and labeled	Weekly
	Containers stored in this area are compatible based on their Reactivity Group	Weekly
	Adequacy of aisle space (marked aisles must be free of containers or other obstructions)	Daily
	Damaged pallets	Weekly
	Number of drums in each storage area does not exceed the maximum capacity	Weekly
Tank Truck and Rail Loading/	Hose couplings and valves for leakage	Daily
Unloading Areas	Evidence of spills	Daily
	Removal of spent spill absorbent and cleanup materials	Daily
	Liquid accumulation (including precipitation) in containment sump/ area	Daily
	Pumps, valves, and piping systems for leakage	Daily
	Grating and curbs for cracks, damage	Daily
	Cracks and gaps in, or damages to, containment base, sumps and drains, and their coatings (if applicable)	Daily

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	<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>	<u>INSPECTION FREQUENCY</u>
Tank Containment Areas	Evidence of spilled materials	Daily
	Liquid accumulation (including precipitation) in containment sump/area*	Daily
	Cracks and gaps in, or damages to, containment base, sumps, and drains and their coatings	Daily
	Removal of spent spill absorbent and cleanup materials	Daily
	Debris or improperly stored equipment	Daily
	Evidence of seepage outside containment area (e.g. discoloration, wet spots)	Daily
Piping (Outside of Containment Areas)	Signs of leakage	Daily
	Corrosion, cracks, or other signs of Distress	Daily
	Discoloration of insulation, fittings or exposed pipe	Daily
	Deterioration or corrosion of pipe racks	Daily
Tanks (External)	Evidence of leaks and obvious deformation	Daily
	Integrity of liquid level indicator mechanism	Daily
	Integrity of high level alarm	Daily

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<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>		<u>INSPECTION FREQUENCY</u>
	Corrosion, cracks, distortion of piping and pipe connections	Daily
	Distortion and corrosion of anchor bolts	Daily
	Leakage of pump seals	Daily
	Leakage of valve seals	Daily
	Cracks and corrosion of nozzles	Daily
Tanks (Internal)	Inspect tank interior	See Note 1
	Check tank wall thickness	See Note 1
	Inspect corrosion coupon	Monthly

1. Completed by the effective date of the permit.

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ATTACHMENT C
INCOMPATIBLE WASTES

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ATTACHMENT C

INCOMPATIBLE WASTES

Many hazardous wastes, when mixed with other waste or materials at a hazardous waste facility, can produce effects which are harmful to human health and the environment, such as: (1) heat or pressure, (2) fire or explosion, (3) violent reaction, (4) toxic dusts, mists, fumes, or gases, or (5) flammable fumes or gases.

Below are examples of potentially incompatible waste groups and materials, along with the harmful consequences, which result from mixing materials in one group with materials in another group. The list is intended as a guide to indicate the need for special precautions when managing these potentially incompatible waste materials or components.

This list is not intended to be exhaustive. The Permittee must, as the regulations require, adequately analyze his wastes so that he can avoid creating uncontrolled substances or reactions of the type listed below, whether they are listed below or not.

The waste streams accepted at AETS are from the following chemical groups:

Acid	Aromatics
Alcohol & Glycol	Ketones
Aldehydes	Unsaturated Aliphatic
Amines	Saturated Aliphatic
Caustics	Phenols & Creosols
Esters	Combustible & Flammable
Ether	Water Mixtures
Halogens	Organic Sulfides

Possible incompatible groups and their reactions if mixed with waste streams accepted at AETS are the following:

A. Organic Acids

ORGANIC ACIDS + ALCOHOLS and GLYCOLS

The organic acids of primary concern in this combination are those with alpha-substituted halogens such as chloroacetic acid, and alpha- and Beta-substituted carboxyl groups such as oxalic acid and malonic acid. These acids are comparable in strength to strong mineral acids and can catalyze dehydration and esterification in alcohols and glycols with heat generation.

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Polyhydric alcohols and polybasic acids can polymerize by esterification with much heat evolved. Due to their acid strength, these halo organic acids would be more accurately compared to acids of Group 1 in terms of reactivity. Hereafter, refer to Group I to find the reactivity of these acids. The non- substituted monobasic aliphatic and aromatic acids are relatively nonreactive with alcohols and glycols and esterify only with strong mineral acids or other catalysts present.

ORGANIC ACIDS + ALDEHYDES

Exothermic condensation reactions can occur between these two types of compounds. The acidic character of the organic acids may be sufficient to catalyze the reaction. Polybasic and unsaturated acids are susceptible to polymerization under these conditions, resulting in much heat generated.

ORGANIC ACIDS + CAUSTICS

Acid base reactions produce heat.

ORGANIC ACIDS + OXIDIZING AGENTS

The hydrocarbon moiety of the organic acids are susceptible to decomposition by strong oxidizing agents releasing heat and gas. The gas produced can be toxic if the acid contains halogens such as dichlorophenoxy acetic acid, or if it contains other hetero atoms.

ORGANIC ACIDS + REDUCING AGENTS

Carboxylic acids are easily reduced by lithium aluminum hydride to the corresponding alcohols with some heat generation. Other reducing agents require more vigorous reaction conditions. Flammable hydrogen gas can be produced from extractions of the hydroxyl proton and the B-hydrogens.

B. Glycols and Alcohols

ALCOHOLS and GLYCOLS + OXIDIZING AGENTS

Oxidation of alcohols and glycols with these strong oxidizing agents can produce heat and inflame or can form explosively unstable compounds.

ALCOHOLS and GLYCOLS + REDUCING AGENTS

The hydroxyl proton is easily extracted by these strong reducing agents to yield flammable hydrogen gas. In many cases, ignition occurs and sometimes explosions may also occur.

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C. Aldehydes

ALDEHYDES + CAUSTICS

Aldehydes undergo self-condensation in combination with caustics and, in the case of acrolein, can result in violent polymerization. Much heat is evolved.

ALDEHYDES + UNSATURATED ALIPHATICS

At elevated temperatures, a Diels-Alder type reaction can take place between acrolein and 1, 3-butadiene and may be exothermic.

ALDEHYDES + OXIDIZING AGENTS

Aldehydes are very easily oxidized by these compounds resulting in formation of the corresponding carboxylic acid or complete decomposition. In both cases, heat is evolved, and fires can result.

ALDEHYDES + REDUCING AGENTS

The labile α -hydrogens of the aldehydes may be extracted by some reducing agents to yield flammable hydrogen gas with some heat.

D. Caustics

CAUSTICS + ESTERS

Esters are easily hydrolyzed by caustics to a salt and alcohol with heat generation.

CAUSTICS + HALOGENATED ORGANICS

Aliphatic halides can undergo substitution or dehydrohalogenation upon treatment with strong caustics. Both processes involve some heat generation while the second evolves flammable olefins and acetylenes, especially with the lower molecular weight compounds. Halogenated aromatics, however, are relatively stable to strong caustics.

CAUSTICS + KETONES

Caustics can catalyze the self-condensation of ketones yielding heat.

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E. Esters

ESTERS + STRONG OXIDIZERS

Vigorous oxidation of the hydrocarbon moiety can occur yielding much heat.

ESTERS + STRONG REDUCING AGENTS

The alpha-hydrogens can be easily scavenged by these metals yielding hydrogen gas and heat.

F. Ethers

ETHERS + STRONG OXIDIZERS

These compounds can react violently upon contact yielding much heat and causing ignition and explosions.

G. Aromatic Hydrocarbons

AROMATIC HYDROCARBONS + STRONG OXIDIZING AGENTS

Violent reactions can occur between these types of compounds resulting in heat and fire.

H. Halogenated Organics

HALOGENATED ORGANICS + OXIDIZING AGENTS

Halogenated organics can be easily oxidized by these compounds yielding heat and toxic and corrosive hydrogen halide fumes.

HALOGENATED ORGANICS + REDUCING AGENTS

Boranes are known to form explosive mixtures with alkyl halides. Also halogenated organics, especially alkyl halides form explosive mixtures with alkali and alkaline earth metals.

I. Ketones

KETONES + STRONG OXIDIZING AGENTS

Exhaustive oxidation can generate much heat and ignite the mixture.

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KETONES + STRONG REDUCING AGENTS

These metals can readily abstract the labile alpha-hydrogens forming flammable hydrogen gas and heat. Other reducing agents may also react with ketones in the same manner.

J. Aliphatic Hydrocarbons

UNSATURATED ALIPHATICS + STRONG OXIDIZER

Exhaustive oxidation can result in ignition of the hydrocarbons.

SATURATED ALIPHATICS + OXIDIZING AGENTS

These hydrocarbons can be easily oxidized to yield heat and may ignite.

K. Phenols and Cresols

PHENOLS and CRESOLS + OXIDIZING AGENTS

Mild oxidation can yield ketones, carboxylic acids, and carbon dioxide with some heat. exhaustive oxidation can yield much more heat and possibly fire.

PHENOLS and CRESOLS + REDUCING AGENTS

Flammable hydrogen gas can be liberated by abstraction of the phenolic hydrogen. The heat of reaction may ignite the gas. The phenolic hydrogen is readily extracted by reducing agents, especially hydrides to yield flammable hydrogen gas and heat.

L. Combustible and Flammable Material

COMBUSTIBLES + OXIDIZING AGENTS

Heat, fire, and possibly explosions can result from this combination. Toxic gases can result if the combustible material contains compounds of nitrogen, sulfur, or phosphorous.

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COMBUSTIBLES + REDUCING AGENTS

These miscellaneous combustibles may contact water, which can react with many reducing agents to form flammable hydrogen gas. The reducing agents are also pyrophoric and can ignite the combustibles in the presence of air.

M. Amines

AMINES + OXIDIZING AGENTS

Exhaustive oxidation of amines with these oxidizing agents can result in heat generation and evolution of toxic nitrogen oxide fumes.

AMINES + REDUCING AGENTS

Alkyl metal halides can undergo a Grignard reaction with primary and secondary amines forming the corresponding alkanes. Enough heat may be evolved to cause a fire hazard. See Note 7 + 21 for the combination of amines and alkali and alkaline earth metals. Other reducing agents may also react with amines in a similar manner yielding heat and hydrogen gas.

N. Mercaptans and Other Organic Sulfides

MERCAPTANS + OXIDIZING AGENTS

Exhaustive oxidation can result in much heat generation and formation of toxic sulfur oxide fumes.

MERCAPTANS + REDUCING AGENTS

These active metals can easily abstract the sulfhydryl hydrogen to form flammable hydrogen gas and the mercaptide with heat.

Other strong reducing agents may react in the same manner generating hydrogen.

The above information was extracted from a U.S. Environmental Protection Agency publication called "A Method For Determining The Compatibility of Hazardous Wastes" dated April 1980.

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ATTACHMENT D

SUMMARY OF RCRA CORRECTIVE ACTION ACTIVITIES

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ATTACHMENT D

Summary of RCRA Corrective Action Activities Advanced Environmental Technical Services (AETS) April 2004

Advanced Environmental Technical Services (AETS), formerly known as Century Resources, Inc., is performing RCRA corrective action activities at the site in accordance with the original RCRA permit (Log No. B-115) issued to its facility in Alsip, Illinois (Illinois EPA ID No. 0310030002; USEPA ID No. ILD099215303). The effective date of the original permit was November 2, 1992.

Section IV of the original RCRA permit describes the procedures which must be followed in carrying out the corrective action activities. The ten solid waste management units (SWMUs) which were to be addressed at the site are identified below (Attachment D-1 shows the location of these SWMUs):

<u>SWMU No.</u>	<u>Name</u>
1	Truck Pad Nos. 1, 2 and 3
2	Truck Pad No. 5
3	Former Spill Collection UST
4	Former UST Fuel Oil Tanks
5	Tank No. 4
6	Drum Storage Areas
7	West Sump (Sump No. 1)
8	East Sump (Sump No. 2)
9	Maintenance Room Grit Traps
10	Exchanger Cleaning Sump

A summary of the RCRA corrective action activities completed to date at the site is provided below:

1. Illinois EPA approved the RCRA Facility Investigation (RFI) Phase I Work Plan on June 4, 1993 (Log No. B-115).
2. Illinois EPA approved the following documents on May 23, 1994 (Log No. B-115): (1) RCRA Facility Investigation Report; and (2) RCRA Facility Investigation-Phase II Work Plan. Illinois EPA determined that no further investigation/corrective action was necessary at

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- SWMU Nos. 2, 6 and 8. Illinois EPA required that extent of contamination be delineated at the remaining seven SWMUs.
3. Illinois EPA approved a document entitled Technical Memorandum-Phase II RCRA Facility Investigation, Initial Groundwater Investigation, in an August 15, 1994 letter (Log No. B-115). Based upon the results of the groundwater investigation contained in this submittal, Illinois EPA approved the proposed location of the monitoring wells.
 4. Illinois EPA approved a document entitled RCRA Facility Investigation, Phase II, Century Resources, Inc., Alsip, Illinois, in a June 19, 1995 letter (Log No. B-115-CA-2). Illinois EPA determined that the extent of soil contamination was properly delineated. However, the facility was required to further evaluate the extent of soil contamination in the vicinity of Tank 4 (SWMU No. 5). Illinois EPA also identified that the next step in the corrective action process was the submission of a Determination of Corrective Action Report.
 5. Illinois EPA approved a document entitled Phase II RFI Work Plan Addendum, Century Resources, Inc., Alsip, Illinois, in an August 4, 1995 letter (Log No. B-115-CA-2). This document addressed Illinois EPA's comments regarding the groundwater related issues included in the June 19, 1995 letter.
 6. Illinois EPA approved a document entitled Draft Determination of Corrective Action Report, Century Resources, Inc., Alsip, Illinois, in a February 6, 1996 letter (Log No. B-115-CA-3). This submittal presented the Phase I of the Corrective Measures Program (CMP) and contained proposed cleanup objectives for both soil and groundwater. It also contained the results of supplemental RFI Phase II activities approved by Illinois EPA on August 4, 1995. Illinois EPA approved the proposed soil and groundwater cleanup objectives and identified that the next step in the corrective action process is the submission of a Conceptual Design Report, which is the Phase II of the Corrective Measures Program.
 7. Illinois EPA approved a document entitled Phase II Corrective Measures Program, Conceptual Design Report, in an October 11, 1996 letter (Log No. B-115-CA-4). This document contained: (1) proposed revised soil cleanup objectives; (2) an application for a groundwater management zone (GMZ); and (3) a proposal to remediate contaminated soil using bioremediation. Illinois EPA identified in its letter that the next step in the corrective action process is the submission of a Final Design and Construction Work Plan, an Operation and Maintenance Plan and a Health and Safety Plan.
 8. Illinois EPA approved a document entitled Phase III Corrective Measures Program, Final Design and Construction Work Plan, in an April 10, 1997 letter (Log No. B-115-CA-5). This document contained the final design of a bioventing treatment system for the remediation of

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contaminated soil and a proposed Groundwater Management Zone (GMZ) monitoring plan. Illinois EPA required that a Construction Certification Report be submitted upon completion of construction/installation of the bioventing remediation system. Illinois EPA also approved the soil verification sampling plan.

9. Illinois EPA approved a document entitled Phase IV Corrective Measures Program, Construction Certification Report, in an August 19, 1997 letter (Log No. B-115-CA-7). This report documented installation of a bioventing soil remediation system. Illinois EPA required that during the operation of the bioventing system, the facility submit Progress and Effectiveness Reports, which is Phase V of the Corrective Measures Program.
10. On July 27, 1998, Illinois EPA responded to a May 22, 1998 submittal (Log No. B-115-CA-9). This submittal proposed: (1) a revised soil remediation objective for benzene; (2) a verification soil sampling plan which was revised based upon the new remediation objective for benzene and contained less number of sample locations than originally approved by Illinois EPA; and (3) a proposal for no further action for chrysene in soil. Illinois EPA disapproved the proposed revised soil remediation objective for benzene and the revised soil verification sampling plan. However, Illinois EPA determined that chrysene was not a contaminant of concern in soil at the site.
11. On September 16, 1998, Illinois EPA responded to a July 31, 1998 submittal (Log No. B-115-CA-10). This submittal requested an extension to complete corrective action activities and submit the certification/documentation report. Illinois EPA approved this request and required that the corrective measures completion certification and associated documentation report be submitted to Illinois EPA by April 1, 1999.
12. On December 8, 1998, Illinois EPA responded to an October 2, 1998 submittal (Log No. B-115-CA-11). This submittal proposed: (1) a revised soil remediation objective for benzene; (2) a verification soil sampling plan which was revised based upon the new remediation objective for benzene and contained less number of sample locations than originally approved by Illinois EPA. Illinois EPA approved this submittal with some conditions.
13. On May 6, 1999, Illinois EPA responded to March 29, 1999 and April 13, 1999 submittals (Log No. B-115-CA-12). These submittals proposed: (1) removing the standing water from SWMU 5 area in order to properly collect closure sampling, and managing it as non-hazardous special waste; (2) a time extension for completing corrective action activities and submitting the corrective measures certification/documentation report by June 1, 1999, providing cleanup objectives are met; and (3) a modification to the approved soil verification sampling plan to collect a maximum of three verification soil samples at each sampling location from ground surface to six feet or to groundwater whichever is shallower; the

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approved plan required collection of a minimum of three samples at each location from ground surface to a depth of six feet (0-2 feet, 2-4 feet, and 4-6 feet) or to groundwater, whichever is deeper. Illinois EPA approved these submittals with some conditions.

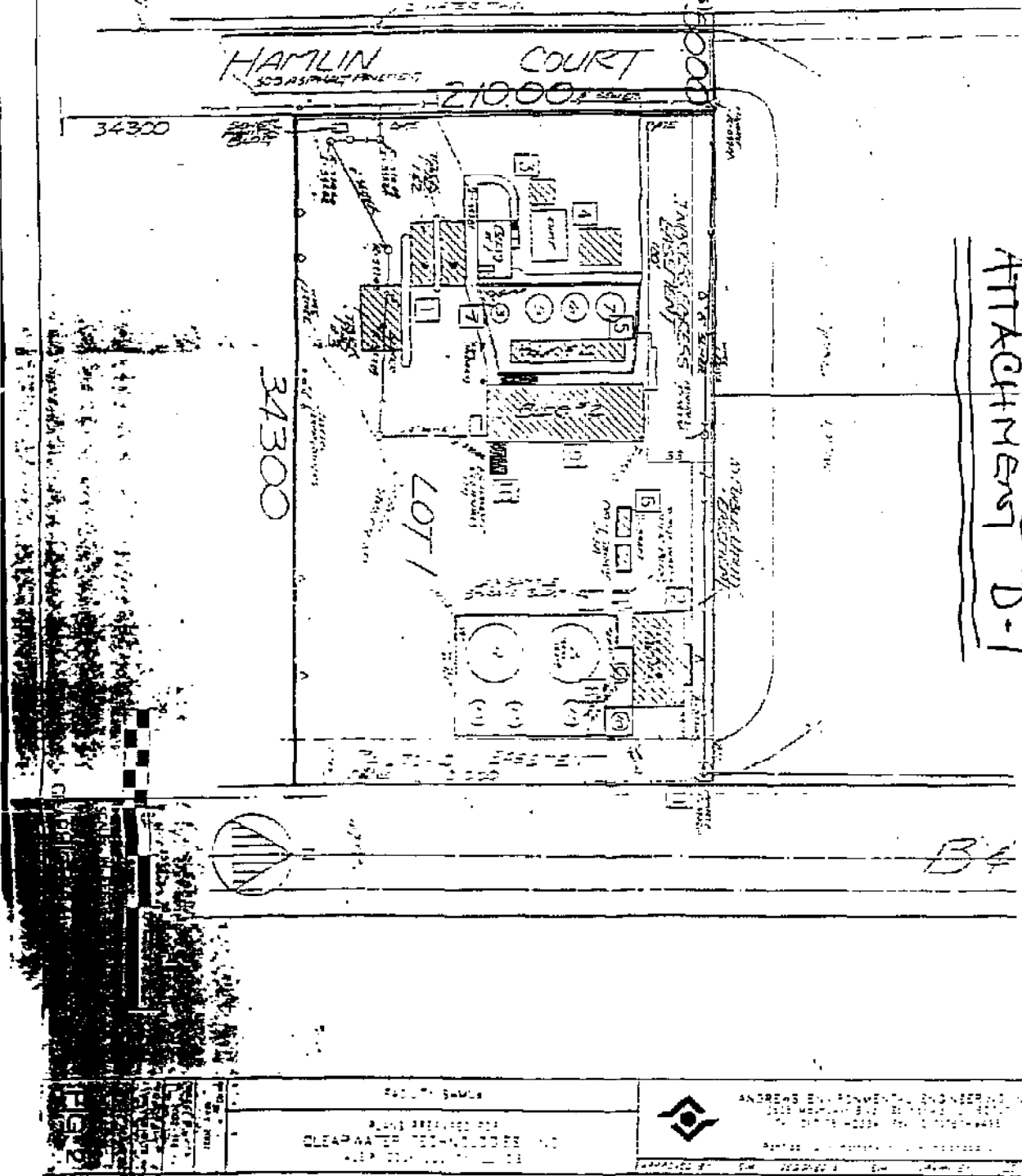
14. On August 30, 1999, Illinois EPA approved a document entitled Soils Corrective Measures Documentation Report, (Log No. B-115-CA-13). This submittal contained: (1) documentation of the completion of the soil corrective measures activities which consisted of a bioventing process; (2) results of the soil verification sampling/analysis activities; and (3) a certification statement signed by the owner/operator and a licensed professional engineer, that the corrective measures were completed in accordance with the approved plan. Illinois EPA determined that no further soil investigation/remediation was necessary at the SWMUs of concern at the facility. However, groundwater contamination is still being addressed at the site.
15. On March 2, 2000, Illinois EPA disapproved an October 15, 1999 submittal (Log No. B-115-CA-14). This submittal proposed: (1) to utilize Oxygen Release Compound (ORC®) to accelerate bioremediation in groundwater in the vicinity of wells MW-3A and G-103; and (2) to perform GMZ monitoring on a quarterly basis, rather than the semi-annual basis, during the accelerated bioremediation effort.
16. On March 22, 2001, Illinois EPA disapproved a January 17, 2001 submittal (Log No. B-115-CA-15). This submittal proposed: (1) to reduce the groundwater monitoring locations from eight monitoring wells in the current program, to the two impacted wells, MW-3A and G-103; and (2) to reduce the sampling frequency for the GMZ monitoring program from the current semi-annual monitoring to annual monitoring.

Attachment: Attachment D-1--Location of SWMUs

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Attachment D-1

- EXPLANATION (unit numbers are shown in boxes)
- 1 - BRICK PADS 1, 2, & 3
 - 2 - BRICK PAD 5
 - 3 - FORMER 6,000 GALLON UST
 - 4 - FORMER USTs 1 & 2
 - 5 - TANK 4
 - 6 - DRUM STORAGE AREA
 - 7 - PUMP 1
 - 8 - PUMP 2
 - 9 - MAIN BRANCH ROOM GRILL PAVILION
 - 10 - EXHAUST CLEANING TANK
 - 11 - MANHOLE AND SANITARY SEWER



ATTACHMENT E

FINANCIAL ASSURANCE/LIABILITY REQUIREMENTS

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Financial Assurance/Liability Requirements

1. CLOSURES, POST-CLOSURE AND CORRECTIVE ACTION

The Permittee shall revise the financial assurance documents on file with the Illinois EPA under the requirements of 35 Ill Admin Code 724, Subpart H, for closure of all hazardous waste management units at the facility and for post-closure care (if applicable). The required revisions include updating the documents to reflect the closure and post-closure costs estimates in the approved permit application. Financial assurance instruments (using the standardized forms promulgated under the provision of 35 Ill Admin Code 724.251) shall be submitted to the Illinois EPA no later than sixty (60) days after the issue date of this permit. Please note that financial assurance must also be established for corrective action.

The Permittee shall provide financial assurances as follows (in 2004 dollars):

1a. Existing Operating Tanks TK11, 12, & 13.	\$81,544.91
1b. Contingency (10%)	<u>\$ 8,154.49</u>
Sub-total	<u>\$89,699.40</u>
2a. Existing Container Storage Area (Outdoor Container Storage Area)	\$7,548.12
2b. Contingency (10%)	<u>\$754.81</u>
Sub-total	<u>\$8,302.93</u>
3a. Container Storage truck Pads (Truck Pads 1, 2, 3 and 5)	\$41,921.93
3b. Contingency (10%)	<u>\$4,192.19</u>
Sub-total	<u>\$46,114.12</u>
4a. Lab Pack Repackaging Container Storage Area	\$ 8,523.59
4b. Contingency (10%)	<u>\$ 852.36</u>
	<u>\$ 9,375.95</u>
5a. Proposed Container Storage Warehouse	\$114,495.59
5b. Contingency (10%)	<u>\$ 11,449.56</u>
	<u>\$125,945.15</u>
6a. Proposed Tanks (Oil Storage & Processing Tanks TK100-105)	\$344,471.28
6b. Contingency (10%)	<u>\$ 34,447.13</u>
Sub-total	<u>\$378,918.41</u>

7a. Proposed Tanks (Oil Storage & Processing Tanks TK106-109)	\$90,031.88
7b. Contingency (10%)	<u>\$9,003.19</u>
Sub-total	<u>\$99,035.07</u>
8a. Proposed Tanks (Fuel Blending & Solvent Processing Tank TK200)	\$23,276.68
8b. Contingency (10%)	<u>\$2,327.67</u>
Sub-total	<u>\$25,604.35</u>
9a. Proposed Tanks (Fuel Blending & Solvent Processing Tanks TK201-202)	\$46,553.36
9b. Contingency (10%)	<u>\$4,655.34</u>
Sub-total	<u>\$51,208.70</u>
10a. Proposed Tanks (Fuel Blending & Solvent Processing Tanks TK203-205)	\$237,280.35
10b. Contingency (10%)	<u>\$23,728.04</u>
Sub-total	<u>\$261,008.39</u>
11a. Proposed Tanks (Fuel Blending & Solvent Processing Tanks TK300-303)	\$316,373.80
11b. Contingency (10%)	<u>\$31,637.38</u>
Sub-total	<u>\$348,011.18</u>
12a. Proposed Tanks (Fuel Blending & Solvent Processing Tanks TK304-307)	\$316,373.80
12b. Contingency (10%)	<u>\$31,637.38</u>
Sub-total	<u>\$348,011.18</u>
13a. Proposed Tanks (Wastewater Tanks TK400-406)	\$553,654.15
13b. Contingency (10%)	<u>\$55,365.42</u>
Sub-total	<u>\$609,019.57</u>
14a. Proposed Tanks (Wastewater Tank TK407)	\$79,053.45
14b. Contingency (10%)	<u>\$7,905.35</u>
Sub-total	<u>\$86,958.80</u>

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15a. Proposed Tanks (Wastewater Tank TK408)	\$39,820.38
15b. Contingency (10%)	<u>\$3,982.04</u>
Sub-total	<u>\$43,802.42</u>
16a. Proposed Tanks (Dissolver Mixing Tanks TK502A & 502B)	\$21,682.04
16b. Contingency (10%)	<u>\$2,168.20</u>
Sub-total	<u>\$23,850.24</u>
17a. Proposed Tanks (Drum Washer Pan System Tank TK503)	\$10,960.44
17b. Contingency (10%)	<u>\$1,096.04</u>
Sub-total	<u>\$12,056.48</u>
18. Corrective Action [Condition IV(F)(1)]	\$89,870.00

<u>Unit</u>	<u>Required for Unit</u> <u>(2004 dollar)</u>
-------------	--

Existing

1) Tanks (TK11, 12, & 13)	\$ 89,699.40
2) Outdoor Container Storage Area (1760)	\$ 8,302.93
3) Container Storage Truck Pads (1,2,3, & 5)	\$ 46,114.12
4) Lab Pack Repackaging Container Storage Area (1540)	<u>\$ 9,375.95</u>
Existing Units Sub-Total	<u>\$153,492.40</u>

Proposed Units to be Operated in the Future

1) Container Storage Warehouse (73,920)	\$ 125,945.15
2) Tanks	
a) Oil Storage & Processing Tanks (TK 100-109)	\$ 477,953.48
b) Fuel Blending & Processing Tanks (TK200-205, & 300-307)	\$1,033,843.80
c) Waste Water Tanks (TK 400-408)	\$ 739,780.79
d) Dissolver Mixing Tanks (TK 502A & 502B)	\$ 23,850.24
e) Drum Washer Pan System Tank (TK503)	<u>\$ 12,056.48</u>
Total for Future Units Sub-Total	<u>\$2,413,429.94</u>

<u>Corrective Action</u>	\$ 89,870.00
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TOTAL	\$2,656,792.34
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2. LIABILITY REQUIREMENTS

The permittee shall maintain liability coverage during the active life (including the closure and post-closure period) of the hazardous waste management unit at this facility to the following amounts:

Liability coverage for sudden accidental occurrences in the amount of at least \$1,000,000 per occurrence with annual aggregates of at least \$2,000,000, exclusive of legal defense costs;

Documentation of liability coverage shall be provided on the appropriate standardized forms promulgated under the provisions of 35 Ill Admin Code 724.251 and shall be submitted to the Illinois EPA prior to effective date of the permit.

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ATTACHMENT F

APPROVED PART B APPLICATION

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ATTACHMENT F

AETS APPROVED PART B APPLICATION

	<u>PAGE</u>	<u>REVISION DATE</u>
SECTION A REVISION 14		10/08/04
Exhibit A-1 RCRA Part A Application Revision 14		10/08/04
Exhibit A-2 Facility Permits Revision 14		10/08/04
Exhibit A-3 Facility Certification Revision 15		11/18/04
Exhibit A-4 Technical Certification Revision 4		03/25/04
Exhibit A-5 Prior Conduct Certification Revision 6		05/18/04
Exhibit A-6 Facility Mailing List		
Exhibit A-7 Sample Copy of Notice of Repository Revision 1 Availability & Permit Application Submission		12/22/03
Exhibit A-8 Newspaper Notice of Application Revision 2		01/29/04
Exhibit A-9 Information Contained in Repositories Revision 15 & Dates Information was Added to Repositories		11/18/04
Exhibit A-10 Agreement Transferring Operating Revision 6 Authority to Century Environmental Resources, Inc.		05/18/04
SECTION B - FACILITY DESCRIPTION Revision 14		10/08/04
Appendix B		12/22/03
Exhibit B-1 Process Flow Diagram Revision 1		12/22/03
Exhibit B-2 SWMU Location Map Revision 14		10/08/04
Exhibit B-3 Description of Facility SWMUs Revision 1		12/22/03
Exhibit B-4 Quadrangle Map Revision 14		10/08/04
Exhibit B-5 Topographic Map Revision 1		12/22/03
Exhibit B-6 Property Legal Description Revision 14		10/08/04
Exhibit B-7 Fault Zone Map Revision 1		12/22/03
Exhibit B-8 Earthquake Map Revision 1 Acceleration		12/22/03
Exhibit B-9 FEMA Flood Plain Map Revision 1		12/22/03
Exhibit B-10 Alsip Public Works Department Correspondence Revision 1		12/22/03
Exhibit B-11 Routing Map Revision 1		12/22/03
Exhibit B-12 Tank Summary Information Revision 11		8/26/04

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SECTION C - WASTE ANALYSIS PLAN Revision 14 10/08/04

Appendix C

Exhibit C-1	List of Wastes Accepted Revision 1	12/22/03
Exhibit C-2	SW-846 Chapter 9 Revision 1	12/22/03
Exhibit C-3	ASTM Method 5058A Revision 1	12/22/03
Exhibit C-4	Waste Preacceptance Analytical Methods Revision 1	12/22/03
Exhibit C-5	NIOSH PPE Recommendations Revision 1	12/22/03
Exhibit C-6	Wastes Not Accepted Revision 1	12/22/03
Exhibit C-7	Wastes Preacceptance Annual Recertification Forms Revision 1	12/22/03
Exhibit C-8	Vehicle Log In Sheet Revision 1	12/22/03
Exhibit C-9	Discrepancy Report Form Revision 1	12/22/03
Exhibit C-10	Hazardous Waste Log In Sheet Revision 1	12/22/03
Exhibit C-11	Hazardous Waste Receipt Control Document Revision 1	12/22/03
Exhibit C-12	Quality Assurance Plan (QAP) Revision 1	12/22/03
Exhibit C-13	Spreadsheet of Wastes Accepted Revision 1	12/22/03

SECTION D - PROCESS INFORMATION Revision 14 10/08/04

Appendix D-1 Revision 1	12/22/03
Appendix D-2 Revision 1	12/22/03
Appendix D-3 Revision 1	12/22/03

Exhibit D-1 to D-34 Revision 1	12/22/03
Exhibit D-35 Truck Pad Documentation Revision 1	12/22/03
Exhibit D-36 and D-37 Lab Pack Repackaging Operations DRNG Revision 3	02/23/04
Exhibit D-38 Proposed Site Plan Revision 9	7/22/04
Exhibit D-39 2004 Tank Inspection Report Revision 11	8/26/04
Exhibit D-41 Construction Certification Report Revision 14	10/08/04
Exhibit D-41a Ceilcote 680 Primer Revision 14	10/08/04
Exhibit D-41b Rust-oleum Industrial DTM Epoxy Mastic Revision 14	10/08/04
Exhibit D-41c Ceilcote EJ3 & EJ4 Revision 14	10/08/04
Exhibit D-41d Truck Pad Figures Revision 14	10/08/04
Exhibit D-41e Construction Certification Revision 14	10/08/04
Exhibit D-41f Photographic Documentation Revision 14	10/08/04
Exhibit D-42 Lab Pack Repackaging Room Revision 14	10/08/04

Existing Systems	D-4	06/05/91
Waste Oil Processing and Storage System	D-4	06/05/91

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Wastewater Storage System	D-5	06/05/91
Wastewater Treatment System	D-5	06/05/91
Existing Truck Loading/Unloading Facilities	D-6	06/05/91
Proposed Systems	D-7	06/05/91
Proposed Wastewater Treatment System	D-7	06/05/91
Proposed Wastewater Storage System	D-9	06/05/91
Proposed Waste Oil Process System	D-10	06/05/91
Proposed Waste Oil Storage System	D-10	06/05/91
Proposed Fuel Blending System	D-11	06/05/91
Fuel Blend Tank Farm	D-11	06/05/91
Dissolver Process	D-13	06/05/91
Solids Repackaging Process	D-14	06/05/91
Proposed Solvent Recovery System	D-14	06/05/91
Proposed Spent Solvent Storage System	D-15	06/05/91
Proposed Miscellaneous Facilities & Processes	D-16	06/05/91
Truck Loading/Unloading	D-16	06/05/91
Railcar Loading/Unloading	D-16	06/05/91
Drum Cleaning Process	D-17	06/05/91
Piping Manifolds	D-17	06/05/91
SECTION E - FINANCIAL ASSURANCE REPORT Revision 14		10/08/04
SECTION F - PROCEDURES TO PREVENT HAZARDS Revision 1		12/22/03
F-1 Security Revision 1		12/22/03
F-2 Inspection Requirements Revision 1		12/22/03
F-3 Equipment Requirements Revision 1		12/22/03
F-4 Preventive Procedures Revision 1		12/22/03
Structures & Equipment		
SECTION G - EVALUATION-ASSESSMENT OF POTENTIAL HAZARDS & CONTINGENCY PLAN (Revision 13)		09/02/04
G-1 Evaluation-Assessment of Potential Hazard Report Revision 13		09/02/04
G-2 Regional Map Revision 13		09/02/04
Appendix G - Revision 1		12/22/03
Exhibit G-1 Assessment of Potential Hazards Report Revision 1		12/22/03

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Exhibit G-2	Regional Map-Revision 13	09/02/04
Exhibit G-3	Facility Location Map Revision 1	12/22/03
Exhibit G-4	Waste Types Received Revision 1	12/22/03
Exhibit G-5	Surrounding Land Use Map Revision 1	12/22/03
Exhibit G-6	Cameo [™] /Aloha [™] /marplot [™] Software Revision 1	12/22/03
Exhibit G-7	Emergency Equipment List __ Revision 1	12/22/03
Exhibit G-8	Notification List __ Revision 1	12/22/03
Exhibit G-9	Emergency Notification Summary Revision 1	12/22/03
Exhibit G-10	Evacuation Routes Revision 1	12/22/03
Exhibit G-11	Waste Transfer Form	12/22/03
Exhibit G-12	Safety and Emergency Equipment Log Sheet Revision 1	12/22/03
Exhibit G-13	Clean Equipment Certification Form Revision 1	12/22/03
Exhibit G-14	Coordination Agreements Revision 1	12/22/03

SECTION H - PERSONNEL TRAINING Revision 1 12/22/03

H-1	Training Program Revision 1	12/22/03
H-2	Implementation of Introductory and Continuing Training Program Revision 1	12/22/03

Appendix H - Revision 1 12/22/03

Exhibit H-1	Introductory and Continuing Training Program Revision 1	12/22/03
Exhibit H-2	Job Descriptions Revision 1	12/22/03
Exhibit H-3	Organizational Chart Revision 1	12/22/03
Exhibit H-4	Employee Job Titles Revision 1	12/22/03
Exhibit H-5	Employee Training Module Key Revision 1	12/22/03
Exhibit H-6	Training Module Descriptions Revision 1	12/22/03
Exhibit H-7	Training Module Required for Job Titles Revision 1	12/22/03
Exhibit H-8	On-the-Job Training Tasks Revision 1	12/22/03
Exhibit H-9	On-the Job Training Evaluation Chart Revision 1	12/22/03
Exhibit H-10	OSHA Training Information Revision 1	12/22/03
Exhibit H-11	Employee Training Record Revision 1	12/22/03

SECTION I - CLOSURE AND POST-CLOSURE REQUIREMENTS Revision 12

8/30/04

I	Closure and Post-Closure Requirements Revision 12	8/30/04
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Appendix	Revision 1	12/22/03
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Exhibit I-1	Facility HWMUS Revision 1	12/22/03
Exhibit I-2	IEPA November 12, 1996 Letter Revision 1	12/22/03
Exhibit I-3	IEPA January 18, 1994 Letter revision 1	12/22/03
Exhibit I-4	Schedule for Closure Revision 1	12/22/03
Exhibit I-5	Financial Assurance Information Revision 1	12/22/03
Exhibit I-6	Contingent Post-Closure Care Plan and Cost Estimate Revision 1	12/22/03
Exhibit I-7	Closure Certification Reports and Class 1* Permit Modifications Previously Submitted to Illinois EPA Revision 14	10/08/04
Exhibit I-8	Closure Cost Estimates Revision 15	11/18/04
SECTION J - OTHER FEDERAL LAWS Revision 1		12/22/03
J-1	Letters Submitted to State and Federal Agencies Regarding Other Federal Laws Revision 1	12/22/03
Appendix J Revision 1		12/22/03
Exhibit J-1	February 2, 1990 Letter from Revision 1 LISD01	12/22/03
Exhibit J-2	March 23, 1990 Letter from Revision 1 Illinois Historic Preservation Agency	12/22/03
SECTION K -- CORRECTIVE ACTION Revision 1		12/22/2003
SECTION AA: -- AIR EMISSION STANDARDS FOR PROCESS VENTS Revision 1		12/22/03
SECTION BB: -- AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS Revision 1		12/22/03
SECTION CC: -- AIR EMISSION STANDARDS FOR TANKS, SURFACE IMPOUNDMENTS AND CONTAINERS Revision 15		11/18/04
EXHIBIT CC-1 -- MANUFACTURER'S LITERATURE ON A TYPICAL GRANULAR ACTIVATED CARBON SYSTEM Revision 14		10/08/04
EXHIBIT CC-2 -- 40 CFR 60, REFERENCE METHOD 21 Revision 14		10/08/04
EXHIBIT CC-3 -- CARBON CANISTER/TANK VENT DRAWINGS Revision 15		11/18/04

ATTACHMENT G
CONSTRUCTION CERTIFICATION

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ATTACHMENT G

When submitting certifications required by a Part B permit for construction of any newly developed areas or units, please complete the attached certification form. This will help to ensure that the submittal reaches its proper destination and that the certification will meet the regulatory requirements. Sending the Field Operations Section (F.O.S.) copy directly to the Field Office is acceptable as long as all copies have a completed copy of the enclosed form attached and you advise the Permit Section, in writing, that a copy has been sent to F.O.S.

A documentation report and as-built drawings (sealed and signed by an Illinois Professional Engineer) must be included with this certification. Information necessary to document the construction of the unit or area and to support the certification must be contained within the report. This report should include a thorough description of all construction data and drawings and should be formatted in a logical and orderly manner. The construction documentation report must contain at least the following items:

1. An introduction and summary which describes the scope and purpose of the project;
2. A description of all construction activities, including quality assurance and quality control;
3. As-built drawings of the area or unit and a description of any deviations from the plans and specifications approved in the permit;
4. A description of the test methods used and justification for any deviations from standard test methods;
5. A summary of test results, identification of any samples which did not meet the specifications and the corrective action and retesting which was undertaken in response to any failing test results;
6. Any necessary information associated with construction of the area or unit to document that construction was in accordance with the plans and specifications approved by the permit;
7. Information specifically required by the permit; and
8. Any available photographs of the area or unit.

If you have any questions, please contact a member of the DLPC Permit Section at 217/524-3300.

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ATTACHMENT G

This statement is to be completed by both the responsible officer and the registered professional engineer upon completion of construction in accordance with 35 IAC Section 702.126. Submit one copy of the certification with original signatures and two additional copies (four additional copies for UIC wells). Forward these certification statements and any information required by the permit to the following address:

Illinois Environmental Protection Agency
 Division of Land Pollution Control - #33
 Permit Section
 1021 N. Grand Avenue East
 Springfield, Illinois 62794-9276

FACILITY NAME: _____

IEPA SITE CODE: _____

U.S. EPA ID NO.: IL _____

PART B PERMIT LOG #/UIC PERMIT #: _____

PERMIT (OR MODIFICATION) ISSUANCE DATE: _____

PERMIT CONDITION NO. REQUIRING CERTIFICATION: _____

The _____ has been constructed in accordance with the specifications in the Part B Permit. Documentation that the construction was in accordance with the permit is contained in the enclosed report. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

 Signature of Owner/Operator

 Name and Title

 Signature of Registered P.E.

 Name of Registered P.E. and
 Illinois Registration Number

 Date

 (SEAL)

10/11/12/2000 9:26AM by sp4273 p. 144/168

ATTACHMENT H
PRE-ACCEPTANCE ANALYSIS REQUIREMENTS
ILD099215303

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ATTACHMENT H

Annual Generator Special Waste Recertification for Treatment of Special Waste

Generator Name: _____ Illinois ID #: _____

Generic Waste Name: _____

Process Which Generated Waste: _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is true, accurate, and complete. I have used intimate knowledge of our process which generates the waste and certify that neither the process generating the waste nor the chemical or physical characteristics of the waste have changed since the preacceptance analysis was conducted on this waste. I am aware that there are significant penalties for knowingly submitting false information, including the possibility of fine and imprisonment.

Signature: _____
(Facility operator or duly authorized Agent)

Date: _____

Printed Name: _____

Title: _____

Note to Generator: Preacceptance analysis must be conducted in accordance with the receiving facility's permit, every five years.

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Special Waste Preacceptance Form (Profile Identification Sheet)

Facility Name: _____ Facility I.D. No.: _____
Facility Address: _____ Generator Contact Person: _____
Generator Name: _____ Generator Mailing Address: _____
(If Different) _____
Generator Address: _____ Phone Number: _____
IL Generator I.D. No.: _____ Transporter: _____
Generator SIC Code: _____ Transporter Phone: _____

This is a: _____ Pollution Control Waste, _____ Industrial Process Waste as defined in Section 3 of the Act.

Process Description: _____

Generic Waste Name: _____ Ultimate Disposal: _____

Analysis
(leave blank any constituent for which analysis has not been conducted)

Physical Characteristics: _____ Major Constituents: _____
(e.g. color, odor)

Paint Filter Test: _____ Penetrometer Test: _____
(Indicate pass or fail) (Indicate pass or fail in accordance with the procedures in 35 Ill. Adm. Code 729.321)

Waste Phase: _____ Flash Point °F: _____ Percent Solids: _____
(Indicate solid, liquid, semi solid or compressed gas)

Percent Acidity/Alkalinity: _____ pH (for aqueous wastes only): _____

	Regulatory Threshold Level, ppm	PQL (ppm)	Results of the Analysis		Regulatory Threshold Level, ppm	P QL (ppm)	Results of the Analysis
Constituent				Constituent			
D004 Arsenic	5.0	_____	_____	D026 Cresol	200.00	_____	_____
D005 Barium	100.0	_____	_____	D027 1,4-Dichlorobenzene	7.5	_____	_____
D006 Cadmium	1.0	_____	_____	D028 1,2-Dichloroethane	0.5	_____	_____
D007 Chromium	5.0	_____	_____	D029 1,1-Dichloroethylene	0.7	_____	_____
D008 Lead	5.0	_____	_____	D030 2,4-Dinitroloene	0.13	_____	_____
D009 Mercury	0.2	_____	_____	D031 Heptachlor	0.008	_____	_____
D010 Selenium	1.0	_____	_____	(and its epoxide)		_____	_____
D011 Silver	5.0	_____	_____	D032 Hexachlorobenzene	0.13	_____	_____
D012 Endrin	0.02	_____	_____	D033 Hexachlorobutadiene	0.5	_____	_____
D013 Lindane	0.4	_____	_____	D034 Hexachloroethane	3.0	_____	_____
D014 Methoxychlor	10.0	_____	_____	D035 Methyl ethyl ketone	200.0	_____	_____
D015 Toxaphene	0.5	_____	_____	D036 Nitrobenzene	2.0	_____	_____
D016 2,4 D(2,4-Dichloro phenoxyacetic acid)	10.0	_____	_____	D037 Pentachlorophenol	100.0	_____	_____
D017 2,4,5-TP Silvex	1.0	_____	_____	D038 Pyridine	5.0	_____	_____
D018 Benzene	.05	_____	_____	D039 Tetrachloroethylene	0.7	_____	_____
D019 Carbon tetrachloride	0.5	_____	_____	D040 Trichloroethylene	0.5	_____	_____
D020 Chlordane	0.03	_____	_____	D041 2,4,5-Trichlorophenol	400.0	_____	_____
D021 Chlorobenzene	100.0	_____	_____	D042 2,4,6-Trichlorophenol	2.0	_____	_____
D022 Chloroform	6.0	_____	_____	D043 Vinyl Chloride	0.2	_____	_____
D023 o-Cresol	200.0	_____	_____	Reactive Sulfide		_____	_____
D024 m-Cresol	200.0	_____	_____	Reactive Cyanide		_____	_____
D025 p-Cresol	200.0	_____	_____	Phenols		_____	_____
				EOX/TOX (circle one)		_____	_____
				PCBs		_____	_____

Is the certification form attached which certifies the absence of each constituent for which analysis has not been conducted (non-commingled hazardous waste only): Yes _____ No _____

The above analysis has been conducted in accordance with SW-846 Test Methods for Evaluation of Solid Waste. I have reviewed the analysis and the attached certification form (if applicable) and determined that the waste will be: _____ accepted _____ rejected in accordance with the terms of our facility operating permit. In addition, I agree to require the generator to recertify annually that this waste has not changed since the preacceptance analysis was conducted.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is true, accurate, and complete. I am aware that there are significant penalties for knowingly submitting false information, including the possibility of fine and imprisonment.

Signature: _____
(Facility operator or duly authorized Agent)

Date: _____

Printed Name: _____

Title: _____

This certification statement must be provided by the generator of non-hazardous waste unless analysis is provided for each parameter identified below.

Certification Form

Generator Name: _____

Illinois ID #: _____

Generic Waste Name: _____

Process Which Generated Waste: _____

I certify that the following constituents (checked no below) are not present in my waste stream above the PQL identified in 35 IAC 725, Appendix I:

Characteristics of Hazardous Waste: Indicate if this waste contains any of the following characteristics above the PQL.

Constituent	Regulatory Threshold Level, ppm	PQL (ppm)	Constituent above the PQL		Constituent	Regulatory Threshold Level, ppm	PQL (ppm)	Constituent above the PQL	
			Yes	No				Yes	No
D004 Arsenic	5.0	.053	—	—	D026 Cresol	200.00	.010	—	—
D005 Barium	100.0	.002	—	—	D027 1,4-Dichlorobenzene	7.5	.005	—	—
D006 Cadmium	1.0	.004	—	—	D028 1,2-Dichloroethane	0.5	.005	—	—
D007 Chromium	5.0	.070	—	—	D029 1,1-Dichloroethylene	0.7	.005	—	—
D008 Lead	5.0	.040	—	—	D030 2,4-Dinitrofluorene	0.13	.010	—	—
D009 Mercury	0.2	.002	—	—	D031 Heptachlor (and its epoxide)	0.008	.010	—	—
D010 Selenium	1.0	.750	—	—	D032 Hexachlorobenzene	0.13	.010	—	—
D011 Silver	5.0	.070	—	—	D033 Hexachlorobutadiene	0.5	.010	—	—
D012 Endrin	0.02	.010	—	—	D034 Hexachloroethane	3.0	.010	—	—
D013 Lindane	0.4	.00004	—	—	D035 Methyl ethyl ketone	200.0	.100	—	—
D014 Methoxychlor	10.0	.010	—	—	D036 Nitrobenzene	2.0	.010	—	—
D015 Toxaphene	0.5	.010	—	—	D037 Pentachlorophenol	100.0	.050	—	—
D016 2,4-D(2,4-Dichloro- phenoxyacetic acid)	10.0	.010	—	—	D038 Pyridine	5.0	.010	—	—
D017 2,4,5-TP Silvex	1.0	.002	—	—	D039 Tetrachloroethylene	0.7	.005	—	—
D018 Benzene	.05	.005	—	—	D040 Trichloroethylene	0.5	.005	—	—
D019 Carbon tetrachloride	0.5	.001	—	—	D041 2,4,5-Trichlorophenol	400.0	.010	—	—
D020 Chlordane	0.03	.010	—	—	D042 2,4,6-Trichlorophenol	2.0	.010	—	—
D021 Chlorobenzene	100.0	.005	—	—	D043 Vinyl Chloride	0.2	.010	—	—
D022 Chloroform	6.0	.005	—	—					
D023 o-Cresol	200.0	.010	—	—					
D024 m-Cresol	200.0	.010	—	—					
D025 p-Cresol	200.0	.010	—	—					

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is true, accurate, and complete. I have used intimate knowledge of our process which generates the waste and adequate Material Safety Data Sheets as defined below, to determine the hazardous constituents which I have certified are not contained in this waste in accordance with 35 IAC 722.11(d). I am aware that there are significant penalties for knowingly submitting false information, including the possibility of fine and imprisonment.

Signature: _____
(Generator's signature or duly authorized Agent)

Date: _____

Printed Name: _____

Title: _____

Note to Generator: The hazardous constituents which you have certified as not being present are subject to verification analysis at the receiving facility.

Definitions

1. **Manufacturing Process** - for the purpose of these analyses requirements, a manufacturing process is limited to a controlled manufacturing operation which combines specific ingredients and follows quality control procedures to obtain a specific product.
2. **Adequate Material Safety Data Sheet (MSDS)** - a material safety data sheet which identifies the exact percentage of each constituent identified in 35 IAC 721, Appendix H in the material, compound, or product.
3. **Intimate generator knowledge** - the generator's ability to use experience, knowledge of his process and adequate MSDS to determine the exact percent of each hazardous constituent (as identified in 35 IAC 721 Appendix H) present in the waste.
4. **Lab Pack** - small containers packed in absorbent material inside an overpack as defined in 35 IAC 724.416.

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ATTACHMENT I
CLOSURE CERTIFICATION

ILD099215303

Log No. B-115-R

0310030002 -- Cook
 ILD099215303
 Log No. B115R
 Page I-1 of I-1

ATTACHMENT-I

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

The hazardous waste management S01, S02, T01, etc.; units at the facility described in this document have been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

 USEPA ID Number

 Facility Name

 Signature of Owner/Operator

 Name and Title

 Signature of Registered P.E.

 Name of Registered P.E. and Illinois
 Registration Number

 Date

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**RESPONSE TO COMMENTS
REGARDING
THE FEDERAL RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT
TO BE ISSUED TO
ADVANCED ENVIRONMENTAL TECHNICAL SERVICES (OWNER)
CENTURY ENVIRONMENTAL RESOURCES, INC. (OPERATOR)
1300 HAMLIN COURT
ALSIP, ILLINOIS**

INTRODUCTION

This response is issued pursuant to Title 40 of the Code of Federal Regulations (40 CFR) Section 124.17, which requires that any changes of draft permit conditions be specified along with the reason for the change; that all significant comments be described and responded to; and that any documents cited in the response be included in the administrative record. Comments were requested regarding the United States Environmental Protection Agency's (U.S. EPA) tentative determination to reissue a RCRA permit to the Permittee.

The 45-day public comment period commenced on September 16, 2004, with a public notice in Tinley Park Star Newspaper and a radio announcement on a local radio station, WVAZ Radio. The termination date of this comment period was November 1, 2004. Written comments on the draft Illinois Environmental Protection Agency permit were received from Advance Technical Services (AETS). No comments were received for the Federal Draft Permit.

Additionally, pertinent information and materials were available at the Alsip-Merrionette Park Public Library, located at 11960 So. Pulaski Road, Alsip, Illinois.

NO FEDERAL COMMENTS WERE RECEIVED

CHANGES TO THE DRAFT PERMIT

(Note: All page numbers are referred to the draft federal permit.)

1. "Draft" and "Draft September, 2004" in the header were deleted from the draft permit, because such references are not needed in the final Federal permit.

DETERMINATION

Based on a full review of all relevant data provided to the U.S. EPA, the U.S. EPA has determined that the final permit contains such terms and conditions necessary to protect human health and the environment.

(ILD 099 215 303)

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT

Facility Name and Location: Advanced Environmental Technology Services
13005 Hamlin Ct.
Alsip, IL 60658

Owner(s): AETS, LLC
720 E. Butterfield Rd.
Lombard, IL 60148

Operator(s): Century Env. Resources, Inc.
228 Beacon PL.
Munster, IN 46321-1101

U.S. EPA Identification Number: ILD 099 215 303

Effective Date: February 23, 2005

Expiration Date: January 19, 2015

Authorized Activities:

The United States Environmental Protection Agency ("U.S. EPA") hereby issues a Resource Conservation and Recovery Act (RCRA) permit (hereinafter referred to as the "permit") to Advanced Environmental Technology Services (AETS) (hereinafter referred to as the "Permittee" or addressed in the second person as "you") in connection with the hazardous waste treatment, storage, and disposal activities at 13005 Hamlin Ct. Alsip, Illinois.

This permit is issued under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984 (42 USC § 6901 *et seq.*) (collectively referred to as RCRA) and U.S. EPA's regulations promulgated thereunder (codified, and to be codified, in Title 40 of the Code of Federal Regulations (40 CFR)).

Specifically, this permit addresses: (1) certain restrictions and prohibitions on land disposal of hazardous wastes in accordance with 40 CFR Part 268; (2) other federal RCRA regulations for which the state has not yet been authorized; and (3) air emissions standards for tanks and containers in accordance with 40 CFR § 264.1080 *et seq.* (40 CFR Part 264, Subpart CC).

The RCRA permit is comprised of both this permit, which contains the effective federal RCRA permit conditions, and the effective state RCRA permit conditions issued by the State of Illinois RCRA program authorized under 40 CFR Part 271 (hereinafter called the "state-issued portion of the RCRA permit"). Any hazardous waste activity which requires a RCRA permit and is not included in the permit is prohibited.

Permit Approval:

On January 31, 1986, the State of Illinois received final authorization pursuant to Section 3006 of RCRA, 42 USC § 6926, and 40 CFR Part 271, to administer the pre-HSWA RCRA hazardous waste program. The State of Illinois has also received final authorization to administer certain additional RCRA requirements on several occasions since then. However, because the U.S. EPA has not yet authorized the State of Illinois to administer certain regulations, including the air emission standards for tanks and containers handling hazardous wastes (see 40 CFR § 264.1080 *et seq.*, also known as "Subpart CC"), recent additions to the regulations covering the land disposal restrictions (40 CFR Part 268), and changes to other sections of applicable regulations, the U.S. EPA Region 5 is issuing the RCRA permit requirements for operations at the Permittee's facility which fall under these regulations.

You must comply with all terms and conditions contained in this permit. This permit consists of all the conditions contained herein, all documents attached hereto and all documents listed or cross-referenced in these documents, approved submittals (including plans, schedules and other documents), and the applicable regulations contained in 40 CFR Parts 124, 260, 261, 262, 264, 268, 270, and applicable provisions of RCRA.

This permit is based on the assumptions that: (1) the information submitted in the Permittee's RCRA permit application dated April 30 2003 and in any subsequent modifications to that application (hereinafter referred to as the "Application") are accurate, and (2) the facility is configured, operated and maintained as specified in the permit, and as described in the permit application.

Any inaccuracies in the submitted information may be grounds for the U.S. EPA to terminate, revoke and reissue, or modify this permit in accordance with 40 CFR §§ 270.41, 270.42 and 270.43; and for enforcement action. You must inform the U.S. EPA of any deviation from, or changes in, the information in the Application that might affect your ability to comply with the applicable regulations or conditions of this permit.

(ILD 099 215 303)


Opportunity to Appeal:

Petitions for review must be submitted within 30 days after the U.S. EPA serves notice of the final permit decision. Any person who filed comments on the draft permit or participated in the public hearing may petition the Environmental Appeals Board to review any condition of the permit decision. Any person who failed to file comments or failed to participate in the public hearing on the draft permit may file a petition for review only to the extent of the changes from the draft to the final permit decision. The procedures for permit appeals are found in 40 CFR § 124.19.

Effective Date:

This permit is effective as of February 23, 2005 and will remain in effect until January 19, 2005, unless revoked and reissued under 40 CFR § 270.41, terminated under 40 CFR § 270.43, or continued in accordance with 40 CFR § 270.51(a).

By:


Margaret M. Buerniero, Director
Waste, Pesticides and Toxics Division

Date:

1/13/05

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SECTION I—STANDARD PERMIT CONDITIONS

I.A EFFECT OF PERMIT

The RCRA permit is comprised of both this permit, which contains the effective federal RCRA permit conditions, and the effective state RCRA permit. You are hereby allowed to manage hazardous waste in accordance with this permit. Under this permit, the storage and treatment of RCRA hazardous waste must comply with all terms and conditions in this permit. Other aspects of the storage and treatment of RCRA hazardous wastes is subject to the conditions in the state-issued portion of the RCRA permit. Any hazardous waste activity, which requires a RCRA permit and is not included in the permit, is prohibited.

Subject to 40 CFR § 270.4, compliance with the RCRA permit during its term constitutes compliance for purposes of enforcement with Subtitle C of RCRA except for those requirements not included in the permit which: (1) become effective by statute; (2) are promulgated under part 40 CFR Part 268 restricting the placement of hazardous waste in or on the land; (3) are promulgated under 40 CFR Part 264 regarding leak detection systems; or (4) promulgated under subparts AA, BB, or CC of 40 CFR Part 265 limiting air emissions. (40 CFR § 270.4)

This permit does not: (1) convey any property rights or any exclusive privilege; (40 CFR § 270.30(g)) (2) authorize any injury to persons or property, or invasion of other private rights; or (3) authorize any infringement of state or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued, or any action brought, under: (1) Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; (2) Sections 104, 106(a), or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 USC §§ 9601 *et seq.* (commonly known as CERCLA); or (3) any other law protecting human health, welfare, or the environment.

I.B PERMIT ACTIONS

I.B.1 Permit Review, Modification, Revocation and Reissuance, and Termination

The U.S. EPA may review and modify, revoke and reissue, or terminate this permit for cause, as specified in 40 CFR § 270.41, § 270.42, and § 270.43. The U.S. EPA may also review and modify this permit, consistent with 40 CFR § 270.41, to include any terms and conditions it determines are necessary to protect human health and the environment under Section 3005(c)(3) of RCRA. The filing of a request for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or

anticipated noncompliance on your part will not stay the applicability or enforceability of any permit condition. (40 CFR § 270.30(f))

You must not perform any construction associated with a Class 3 permit modification request until such modification request is granted and the modification becomes effective. You may perform construction associated with a Class 2 permit modification request beginning 60 days after submission of the request unless the Director establishes a later date. (40 CFR § 270.42(b)(8))

I.B.2 Permit Renewal

This permit may be renewed as specified in 40 CFR § 270.30(b) and Condition I.E.2 of this permit. In reviewing any application for a permit renewal, the U.S. EPA will consider improvements in the state of control and measurement technology, and changes in applicable regulations. (40 CFR § 270.30(b) and RCRA Section 3005(c)(3))

I.C SEVERABILITY

This permit's provisions are severable: if any permit provision, or the application of any permit provision to any circumstance, is held invalid, such provision's application to other circumstances and the remainder of this permit will not be affected. Invalidity of any statutory or regulatory provision on which any condition of this permit is based does not affect the validity of any other statutory or regulatory basis for that condition. (40 CFR § 124.16(a))

I.D DEFINITIONS

The terms used in this permit will have the same meaning as in 40 CFR Parts 124, 260 through 266, 268 and 270, unless this permit specifically provides otherwise. Where neither the regulations nor the permit define a term, the term's definition will be the standard dictionary definition or its generally accepted scientific or industrial meaning.

I.E DUTIES AND REQUIREMENTS

I.E.1 Duty to Comply

You must comply with all conditions of this permit, except to the extent and for the duration for which an emergency permit authorizes such noncompliance (see 40 CFR § 270.61). Any permit noncompliance, except under the terms of an emergency permit, constitutes a violation of RCRA and will be grounds for: enforcement action; permit termination; revocation and reissuance; modification; or denial of a permit renewal application. (40 CFR § 270.30(a))

I.E.2 Duty to Reapply

If you wish to continue the permit regulated activities after the expiration date, you must apply for and obtain a new permit. You must submit a complete application for a new permit at least 180 days before the permit expiration date, unless the Director grants permission for a later submittal date. The Director will not grant permission to submit the complete application for a new permit later than the permit's expiration date. (40 CFR §§ 270.10(h), and 270.30(b))

I.E.3 Permit Expiration

Unless revoked or terminated, this permit and all conditions herein will be effective for a fixed term not to exceed 10 years from this permit's effective date. This permit and all conditions herein will remain in effect beyond the permit's expiration date if you have submitted a timely, complete application (40 CFR § 270.10 and §§ 270.13 through 270.29), and, through no fault of your own, the Director has not made a final determination regarding permit reissuance. (40 CFR §§ 270.50, and 270.51)

I.E.4 Need to Halt or Reduce Activity Not a Defense

In an enforcement action, you are not entitled to a defense that it would have been necessary to halt or reduce the permitted activity to maintain compliance with this permit. (40 CFR § 270.30(c))

I.E.5 Duty to Mitigate

In the event of noncompliance with this permit, you must take all reasonable steps to minimize releases to the environment resulting from the noncompliance and must implement all reasonable measures to prevent significant adverse impacts on human health or the environment. (40 CFR § 270.30(d))

I.E.6 Proper Operation and Maintenance

You must always properly operate and maintain all facilities and treatment and control systems (and related appurtenances) that you install or use to comply with this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires you to operate back-up or auxiliary facilities or similar systems only when necessary to comply with this permit. (40 CFR § 270.30(e))

I.E.7 Duty to Provide Information

You must provide the Director, within a reasonable time, any relevant information that the Director requests to determine whether there is cause to modify, revoke and reissue, or terminate this permit, or to determine permit compliance. You must also provide the Director, upon request, with copies of any records this permit requires. The information you must maintain under this permit is not subject to the Paperwork Reduction Act of 1980, 44 USC §§ 3501 *et seq.* (40 CFR §§ 264.74(a) and 270.30(h))

I.E.8 Inspection and Entry

Upon the presentation of credentials and other legally required documents, you must allow the Director or an authorized representative to:

I.E.8.a Enter at reasonable times upon your premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

I.E.8.b Have access to and copy, at reasonable times, any records that you must keep under the conditions of this permit;

I.E.8.c Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

I.E.8.d Sample or monitor any substances at any location at reasonable times, to ensure permit compliance or as RCRA otherwise authorizes (40 CFR § 270.30(i)).

Notwithstanding any provision of this permit, U.S. EPA retains the inspection and access authority which it has under RCRA and other applicable laws.

I.E.9 Monitoring and Records

I.E.9.a Samples and measurements taken for monitoring purposes must be representative of the monitored activity. The method used to obtain a representative sample of waste, contaminated media, treatment residue, or other waste to be analyzed must be an appropriate method from Appendix I of 40 CFR Part 261, or a method specified in the state-approved waste analysis plan, or an equivalent method approved by the Director. Any laboratory method must be one specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods* (SW-846, latest edition), *Methods for Chemical Analysis of Water and Wastes* (EPA 600/4-79-020), or an equivalent method, as specified in the referenced waste analysis plan. (40 CFR § 270.30(j)(1))

I.E.9.b You must retain, at the facility, all records as specified in 40 CFR § 264.74.

I.E.9.c You must submit all monitoring results at the intervals specified in this permit.

I.E.9.d You must retain all reports, records, or other documents required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the report, record, or other document, unless a different period is specified in this permit. The 3-year period may be extended by request of the Director at any time and is automatically extended during the course of any unresolved enforcement action regarding this facility. (40 CFR §§ 270.30(j) and 270.31))

I.E.10 Reporting Planned Changes

You must notify the Director as soon as possible of any planned physical alterations or additions to the permitted facility. (40 CFR § 270.30(l)(1))

I.E.11 Reporting Anticipated Noncompliance

You must notify the Director, in advance, of any planned changes in the permitted facility or activity that may result in permit noncompliance. Advance notice will not constitute a defense for any noncompliance. (40 CFR § 270.30(l)(2))

I.E.12 Certification of Construction

Subject to the requirements of 40 CFR § 270.32(b)(2) and § 270.42 Appendix I, you must not operate any RCRA air emission control devices completed after the effective date of this permit until you have submitted to the Director, by certified mail or hand-delivery, a letter signed both by your authorized representative and by a registered professional engineer. That letter must state that the portions of the facility covered by this permit (including all air emission control devices required by this permit) have been constructed in compliance with the applicable conditions of this permit. In addition, you must not operate the permitted control devices until either:

I.E.12.a The Director or his/her representative has inspected those portions of the facility and finds them in compliance with the conditions of the permit; or

I.E.12.b The Director waives the inspection, if the inspection is not conducted within 30 days from the receipt of the certification.

I.E.13 Transfer of Permits

This permit is not transferable to any person, except after notice to the Director. You must inform the Director and obtain prior approval of the Director before transferring ownership or operational control of the facility (40 CFR § 270.42, Appendix I). Under 40 CFR § 270.40, the Director may require permit modification, or revocation and reissuance to change the Permittee's name and incorporate other RCRA requirements. Before transferring ownership or operation of the facility during its operating life, you must notify the Director and obtain prior approval and notify the new owner or operator in writing of the requirements of this permit and the requirements of 40 CFR Parts 264, 268, and 270. (40 CFR §§ 264.12(c), 270.30(l)(3), and 270.40(a))

I.E.14 Twenty-Four Hour Reporting

I.E.14.a You must report to the Director any noncompliance with this permit that may endanger human health or the environment. Any such information must be promptly reported orally, but no later than 24 hours after you become aware of the noncompliance.

I.E.14.b The report must include the following information : (1) release of any hazardous waste that may endanger public drinking water supplies; (2) release or discharge of hazardous waste; or (3) fire or explosion from the hazardous waste management facility, that could threaten the environment or human health outside the facility. You must include the following information:

- (1) Name, title and telephone number of the person making the report;
- (2) Name, address and telephone number of the facility;
- (3) Name, address and telephone number of owner or operator;
- (4) Date, time and type of incident;
- (5) Location and cause of incident;
- (6) Identification and quantity of material(s) involved;
- (7) Extent of injuries, if any;
- (8) Assessment of actual or potential hazards to the environment and human health outside the facility, where applicable;

- (9) Description of any emergency action taken to minimize the threat to human health and the environment; and
- (10) Estimated quantity and disposition of recovered material that resulted from the incident. (40 CFR §§ 270.30(l)(6))

I.E.14.c In addition to the oral notification required under Conditions I.E.14.a and I.E.14.b of this permit, a written report must also be provided within 5 calendar days after you become aware of the circumstances. The written report must include, but is not limited to, the following:

- (1) Name, address and telephone number of the person reporting;
- (2) Incident description (noncompliance and/or release or discharge of hazardous waste), including cause, location, extent of injuries, if any, and an assessment of actual or potential hazards to the environment and human health outside the facility, where applicable;
- (3) Period(s) in which the incident (noncompliance and/or release or discharge of hazardous waste) occurred, including exact dates and times;
- (4) Whether the incident's results continue to threaten human health and the environment, which will depend on whether the noncompliance has been corrected and/or the release or discharge of hazardous waste has been adequately cleaned up; and
- (5) If the noncompliance has not been corrected, the anticipated period for which it is expected to continue, and the steps taken or planned to reduce, eliminate, and prevent the recurrence of the noncompliance.

The Director may waive the requirement that written notice be provided within 5 calendar days; however, you will then be required to submit a written report within 15 calendar days of the day on which you must provide oral notice, in accordance with Conditions I.E.14.a and I.E.14.b of this permit. (40 CFR § 270.30(l)(6))

I.E.15 Other Noncompliance

You must report all instances of noncompliance not reported under Condition I.E.14 of this permit, when any other reports this permit requires are submitted. The reports must contain the information listed in Condition I.E.14. (40 CFR § 270.30(l)(10))

I.E.16 Other Information

I.E.16.a Whenever you become aware that you failed to submit or otherwise omitted any relevant facts in the permit application or other submittal, or submitted incorrect information in the permit application or other submittal, you must promptly notify the Director of any incorrect information or previously omitted information, submit the correct facts or information, and explain in writing the circumstances of the incomplete or inaccurate submittal.
(40 CFR § 270.30(l)(11))

I.E.16.b All other requirements contained in 40 CFR § 270.30 not specifically described in this permit are incorporated into this permit and you must comply with all of those requirements.

I.F SIGNATORY REQUIREMENT

You must sign and certify all applications, reports, or information this permit requires, or which are otherwise submitted to the Director, in accordance with 40 CFR § 270.11.
(40 CFR § 270.30(k))

I.G REPORTS, NOTIFICATIONS AND SUBMITTALS TO THE DIRECTOR

Except as otherwise specified in this permit, all reports, notifications, or other submittals that this permit requires to be submitted to the Director should be sent by certified mail or hand-delivered to the U.S. Environmental Protection Agency, Region 5, at the following address:

Waste Management Branch, DW-8J
Waste, Pesticides and Toxics Division
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

I.H CONFIDENTIAL INFORMATION

In accordance with 40 CFR Part 2 Subpart B, you may claim any information this permit requires, or is otherwise submitted to the Director, as confidential. You must assert any such claim at the time of submittal in the manner prescribed on the application form or instructions, or, in the case of other submittals, by stamping the words "Confidential Business Information" on each page containing such information. If you made no claim at the time of submittal, the Director may make the information available to the public without further notice. If you assert a claim, the information will be treated in accordance with the procedures in 40 CFR Part 2. (40 CFR § 270.12)

I.I DOCUMENTS TO BE MAINTAINED AT THE FACILITY

You must maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and all amendments, revisions, and modifications to them.

I.I.1 Operating Record

You must maintain in the facility's operating record the documents required by this permit, and by the applicable portions of 40 CFR §§ 264.1035, 264.1064, 264.1084, 264.1088, 264.1089 and 40 CFR § 264.73 (as they apply to the equipment used to comply with this permit).

I.I.2 Notifications

You must maintain notifications from generators accompanying initial incoming shipments of wastes subject to 40 CFR Part 268 Subpart C, that specify treatment standards, as required by 40 CFR §§ 264.73, 268.7, and this permit.

I.I.3 Copy of Permit

You must keep a copy of this permit on site, including all the documents listed in any attachments, and you must update it as necessary to incorporate any official permit modifications.

I.J ATTACHMENTS AND DOCUMENTS INCORPORATED BY REFERENCE

I.J.1 All attachments and documents that this permit requires to be submitted, if any, including all plans and schedules are, upon the Director's approval, incorporated into this permit by reference and become an enforceable part of this permit. Since required items are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject you to enforcement action under Section 3008 of RCRA. This action may include fines, or permit suspension or revocation.

I.J.2 This permit also includes the documents attached hereto, all documents cross-referenced in these documents, and the applicable regulations contained in 40 CFR Parts 124, 260, 261, 262, 264, 268, 270, and the applicable provisions of RCRA, all of which are incorporated herein by reference.

I.J.3 Any inconsistency or deviation from the approved designs, plans and schedules is a permit noncompliance. The Director may grant written requests for extensions of due dates for submittals required in this permit.

I.J.4 If the Director determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Director may modify this permit according to procedures in Condition I.B of this permit.

I.J.5 If any documents attached to or referenced in this permit are found to conflict with any of the Conditions in this permit, the Condition will take precedence.

I.K COORDINATION WITH THE CLEAN AIR ACT

You must fully comply with all applicable Clean Air Act (CAA) and RCRA permit limits. Where two or more operating limitations apply, the most stringent operating limitation takes precedence.

SECTION II -- LAND DISPOSAL RESTRICTIONS

II.A GENERAL CONDITIONS

II.A.1 You must comply with all the applicable self-implementing requirements of 40 CFR Part 268 and all applicable land disposal requirements which become effective by statute. (42 U.S.C. § 6924)

II.A.2 A mixture of any restricted waste with nonrestricted waste(s) is a restricted waste under 40 CFR Part 268.

II.A.3 Except as expressly allowed under 40 CFR Part 268, you must not in any way dilute a restricted waste or the residual from treatment of a restricted waste as a substitute for adequate treatment to achieve compliance with 40 CFR Part 268, Subpart D, to circumvent the effective date of a prohibition in 40 CFR Part 268, Subpart C, to otherwise avoid a prohibition in 40 CFR Part 268, Subpart C, or to circumvent a land disposal prohibition imposed by Section 3004 of RCRA.

II.A.4 You must maintain a current list of the EPA hazardous waste numbers handled by the facility that are identified in 40 CFR Part 268, Subparts B and C. The list must include all waste numbers handled by the facility, and any associated treatment standards, and shall be updated through the inclusion of new treatment standards, as promulgated or amended. This list must be provided to the U.S. EPA representatives, or their designees, upon request.

II.B TESTING AND RELATED REQUIREMENTS

II.B.1 In accordance with 40 CFR § 268.7(a), you must test any waste generated at the facility, or use knowledge of the waste, to determine if the waste is restricted from land disposal.

II.B.2 You must comply with all applicable treatment standards provided in 40 CFR Part 268, Subpart D.

II.B.3 You must comply with all the applicable notification, certification, and recordkeeping requirements described in 40 CFR § 268.7(a) and (b).

II.C STORAGE PROHIBITIONS

II.C.1 You must comply with all the applicable prohibitions on storage of restricted wastes specified in 40 CFR Part 268, Subpart E.

II.C.2 Except as otherwise provided in 40 CFR § 268.50, you may store restricted wastes in tanks and containers solely for the purpose of the accumulation of such quantities of hazardous wastes as necessary to facilitate proper recovery, treatment, or disposal provided that:

II.C.2.a Each container is clearly marked to identify its contents and the date each period of accumulation begins; and

II.C.2.b Each tank is clearly marked with a description of its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, or such information for each tank is recorded and maintained in the operating record at the facility.

II.C.3 You may store restricted wastes for up to 1 year unless the U.S. EPA or its authorized agent can demonstrate that such storage was not solely for the purpose of accumulating such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal. (40 CFR § 268.50(b))

II.C.4 You may store restricted wastes beyond 1 year; however, you bear the burden of proving that such storage was solely for the purpose of accumulating such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal. (40 CFR § 268.50(c))

II.C.5 You must not store any liquid hazardous waste containing polychlorinated biphenyls (PCBs) at concentrations greater than or equal to 50 parts per million (ppm) unless the waste is stored in a storage facility that meets the requirements of 40 CFR § 761.65(b). This waste must be removed from storage and treated or disposed as required by 40 CFR Part 268 within 1 year of the date when such wastes are first put into storage. (40 CFR § 268.50(f))

II.D BLENDING OF METAL WASTES

You must not dilute metal-bearing wastes (listed in Appendix XI of 40 CFR Part 268), if the diluted waste will be used as fuel in any RCRA permitted combustion facility, unless you have demonstrated that the diluted waste complies with one or more of the criteria specified in 40 CFR § 268.3(c).

SECTION III -- OTHER FEDERAL RCRA REQUIREMENTS

III.A ADDITIONAL HAZARDOUS WASTE NUMBERS

In addition to the hazardous waste numbers listed in the state-issued portion of the RCRA permit, you may handle newly listed hazardous wastes, promulgated under the HSWA, at your facility only if you have processed a Class 1 and/or Class 2 permit modification in accordance with 40 CFR § 270.42(g) and approved by the Director. All handling of these wastes must comply with the applicable provisions of both the state-issued portion and the federally-issued portion of the RCRA permit.

SECTION IV—AIR EMISSIONS STANDARDS (40 CFR Part 264, Subpart CC)

IV.A CONTAINERS AND TANKS

You must comply with all applicable requirements of 40 CFR § 264.1080 through 40 CFR § 264.1090, regarding air emission standards for containers and tanks handling hazardous waste. All containers and tanks not exempt from 40 CFR Part 264, Subpart CC must be managed using Level 1 control or Level 2 control as appropriate. You must not conduct any waste stabilization process, as defined in 40 CFR § 265.1081, in containers and tanks.

IV.A.1 Waste Determination

IV.A.1.a In accordance with the procedures specified in 40 CFR § 264.1083, you must determine the average volatile organic (VO) concentration of: (1) generated hazardous waste at the point of origination, and (2) treated hazardous waste. You must determine the maximum organic vapor pressure of the hazardous waste.

IV.A.2 Containers and Tanks Exempt From Subpart CC Control Standards

IV.A.2.a You cannot store hazardous waste which is not exempt from Subpart CC. For each container or tank you claim to be exempt under Subpart CC under this permit, you must demonstrate by direct measurement or approved method that, the average VO concentration for hazardous waste is less than 500 ppmw, as determined in accordance with 40 CFR §§ 264.1083(a) and 265.1084(a)(2) and (3).

IV.A.2.b For each tank or container, you must review and update this determination in accordance with 40 CFR § 264.1082(c)(1) at least once every 12 months following the date of the initial determination. For each container or tank, you must prepare and maintain the records described in 40 CFR § 264.1089(f). These records must be maintained as part of the operating record.

IV.B RECORDKEEPING AND REPORTING REQUIREMENTS

For each container, you must review and update this determination in accordance with 40 CFR § 264.1082(c)(1) at least once every 12 months following the date of the initial determination. For each container or tank, you must prepare and maintain the records described in 40 CFR § 264.1089(f). These records must be maintained as part of the operating record. Any occurrence of noncompliance must be reported in accordance with 40 CFR § 264.1090(a).